# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ALEX ZAROUR,	: :	
Plaintiff,	: :	
v.	: Civil A	Action No.:
PENSKE MEDIA CORPORATION,	: :	
Defendant.	: :	
	: :	

# **COMPLAINT FOR COPYRIGHT INFRINGEMENT**

Plaintiff, Alex Zarour ("Zarour" or "Plaintiff"), brings this complaint in the United States

District Court for the Southern District of New York against PENSKE MEDIA

CORPORATION ("Penske" or "Defendant"), alleging as follows:

### THE PARTIES

- 1. Plaintiff Alex Zarour is an experienced commercial photographer, specializing in architecture and interiors images. Plaintiff owns and operates Virtually Here Studios. Plaintiff resides in Los Angeles, California.
- 2. Defendant is a Corporation organized and existing under the laws of the State of New York with its principal place of business located in New York, New York. Defendant's agent for service of process is Registered Agent Solutions, Inc., 99 Washington Avenue, Suite 700, Albany, New York, 12260.

## **JURISDICTION AND VENUE**

3. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

- 4. This Court has personal jurisdiction over Defendant because Defendant has maintained sufficient minimum contacts with the State of New York and as a result the exercise of personal jurisdiction over Defendant by this Court would not offend traditional notices of fair play and substantial justice.
- 5. Venue is proper in this district pursuant to 28 U.S.C. § 1400(a) because Defendant or its agent(s) reside or may be found in this district: "A defendant 'may be found' in a district in which he could be served with process; that is, in a district which may assert personal jurisdiction over the defendant."

### **FACTS**

- I. The Photographs at Issue in this Lawsuit
  - 6. On October 7, 2018, Alex Zarour captured the photographs:
    - 8590 Hollywood Blvd Final VirtuallyHereStudios.com-5
    - 8590 Hollywood Blvd Final VirtuallyHereStudios.com-20
    - 8590 Hollywood Blvd Final VirtuallyHereStudios.com-23
    - 8590 Hollywood Blvd Final VirtuallyHereStudios.com-25

("Copyrighted Photographs 1") [Exhibit 1].

- 7. Copyrighted Photographs 1 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
- 8. On September 23, 2018, Alex Zarour captured the photographs:
  - 2230 Fink St VirtuallyHereStudios.com-1
  - 2230 Fink St VirtuallyHereStudios.com-2
  - 2230 Fink St VirtuallyHereStudios.com-9
  - 2230 Fink St VirtuallyHereStudios.com-15

("Copyrighted Photographs 2") [Exhibit 2].

- 9. Copyrighted Photographs 2 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
  - 10. On September 12, 2018, Alex Zarour captured the photographs:
    - 348 S Arden Blvd VirtuallyHereStudios.com-20
    - 348 S Arden Blvd VirtuallyHereStudios.com-23

("Copyrighted Photographs 3") [Exhibit 3].

- 11. Copyrighted Photographs 3 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
  - 12. On June 11, 2018, Alex Zarour captured the photographs:
    - 8601 Woodland Ln virtuallyherestudios.com-2
    - 8601 Woodland Ln virtuallyherestudios.com-6
    - 8601 Woodland Ln virtuallyherestudios.com-7
    - 8601 Woodland Ln virtuallyherestudios.com-11
    - 8601 Woodland Ln virtuallyherestudios.com-33

("Copyrighted Photographs 4") [Exhibit 4].

- 13. Copyrighted Photographs 4 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
  - 14. On May 12, 2018, Alex Zarour captured the photographs:
    - 3722 Effingham virtuallyherestudios.com-1
    - 3722 Effingham virtuallyherestudios.com-2
    - 3722 Effingham virtuallyherestudios.com-7
    - 3722 Effingham virtuallyherestudios.com-8

("Copyrighted Photographs 5") [Exhibit 5].

- 15. Copyrighted Photographs 5 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
  - 16. On April 29, 2018, Alex Zarour captured the photographs:
    - 1829 Courtney VirtuallyHereStudios.com-1
    - 1829 Courtney VirtuallyHereStudios.com-19
    - 1829 Courtney VirtuallyHereStudios.com-33
    - 1829 Courtney VirtuallyHereStudios.com-41
    - 1829 Courtney VirtuallyHereStudios.com-45
    - 1829 Courtney VirtuallyHereStudios.com-49
    - 1829 Courtney VirtuallyHereStudios.com-58

("Copyrighted Photographs 6") [Exhibit 6].

- 17. Copyrighted Photographs 6 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
  - 18. On March 20, 2018, Alex Zarour captured the photographs:
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-1
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-13
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-15
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-21
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-24
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-26
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-30
    - 2401 Nottingham Avenue VirtuallyHereStudios.com-33

- 2401 Nottingham Avenue VirtuallyHereStudios.com-44
- 2401 Nottingham Avenue VirtuallyHereStudios.com-50
- 2401 Nottingham Avenue VirtuallyHereStudios.com-57
- 2401 Nottingham Avenue VirtuallyHereStudios.com-58
- 2401 Nottingham Avenue VirtuallyHereStudios.com-71
- 2401 Nottingham Avenue VirtuallyHereStudios.com-75
- 2401 Nottingham Avenue VirtuallyHereStudios.com-79
- 2401 Nottingham Avenue VirtuallyHereStudios.com-80

("Copyrighted Photographs 7") [Exhibit 7].

- 19. Copyrighted Photographs 7 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).
  - 20. On February 15, 2018, Alex Zarour captured the photographs:
    - 740 N Laurel Ave VirtuallyHereStudios.com-1
    - 740 N Laurel Ave VirtuallyHereStudios.com-4
    - 740 N Laurel Ave VirtuallyHereStudios.com-12
    - 740 N Laurel Ave VirtuallyHereStudios.com-15
    - 740 N Laurel Ave VirtuallyHereStudios.com-18
    - 740 N Laurel Ave VirtuallyHereStudios.com-22
    - 740 N Laurel Ave VirtuallyHereStudios.com-26
    - 740 N Laurel Ave VirtuallyHereStudios.com-103

("Copyrighted Photographs 8") [Exhibit 8].

21. Copyrighted Photographs 8 were registered by Alex Zarour with the United States Copyright Office on October 7, 2022 (Registration No.: VA0002322428).

- 22. On October 28, 2019, Alex Zarour captured the photographs:
  - 3391 Ledgewood virtuallyherestudios.com-2
  - 3391 Ledgewood virtuallyherestudios.com-7
  - 3391 Ledgewood virtuallyherestudios.com-10
  - 3391 Ledgewood virtuallyherestudios.com-15
  - 3391 Ledgewood virtuallyherestudios.com-21
  - 3391 Ledgewood virtuallyherestudios.com-29
  - 3391 Ledgewood virtuallyherestudios.com-46
  - 3391 Ledgewood virtuallyherestudios.com-52
  - 3391 Ledgewood virtuallyherestudios.com-53
  - 3391 Ledgewood virtuallyherestudios.com-55
  - 3391 Ledgewood virtuallyherestudios.com-62
  - 3391 Ledgewood virtuallyherestudios.com-66
  - 3391 Ledgewood virtuallyherestudios.com-78

### ("Copyrighted Photographs 9") [Exhibit 9].

- 23. Copyrighted Photographs 9 were registered by Alex Zarour with the United States Copyright Office on October 9, 2022 (Registration No.: VA0002322426).
  - 24. On October 28, 2019, Alex Zarour captured the photographs:
    - 9551 Oak Pass virtuallyherestudios.com-1
    - 9551 Oak Pass virtuallyherestudios.com-19
    - 9551 Oak Pass virtuallyherestudios.com-25
    - 9551 Oak Pass virtuallyherestudios.com-26
    - 9551 Oak Pass virtuallyherestudios.com-28

- 9551 Oak Pass virtuallyherestudios.com-34
- 9551 Oak Pass virtuallyherestudios.com-58

("Copyrighted Photographs 10") [Exhibit 10].

- 25. Copyrighted Photographs 10 were registered by Alex Zarour with the United States Copyright Office on October 9, 2022 (Registration No.: VA0002322426).
  - 26. On October 28, 2019, Alex Zarour captured the photographs:
    - 9551 Oak Pass virtuallyherestudios.com-1
    - 9551 Oak Pass virtuallyherestudios.com-16
    - 9551 Oak Pass virtuallyherestudios.com-18
    - 9551 Oak Pass virtuallyherestudios.com-19
    - 9551 Oak Pass virtuallyherestudios.com-22
    - 9551 Oak Pass virtuallyherestudios.com-25
    - 9551 Oak Pass virtuallyherestudios.com-26
    - 9551 Oak Pass virtuallyherestudios.com-27
    - 9551 Oak Pass virtuallyherestudios.com-28
    - 9551 Oak Pass virtuallyherestudios.com-34
    - 9551 Oak Pass virtuallyherestudios.com-38
    - 9551 Oak Pass virtuallyherestudios.com-39
    - 9551 Oak Pass virtuallyherestudios.com-40
    - 9551 Oak Pass virtuallyherestudios.com-47
    - 9551 Oak Pass virtuallyherestudios.com-58

("Copyrighted Photographs 11") [Exhibit 11].

- 27. Copyrighted Photographs 11 were registered by Alex Zarour with the United States Copyright Office on October 9, 2022 (Registration No.: VA0002322426).
  - 28. On October 20, 2019, Alex Zarour captured the photographs:
    - 3112 Waverly virtuallyherestudios.com-3
    - 3112 Waverly virtuallyherestudios.com-7
    - 3112 Waverly virtuallyherestudios.com-15
    - 3112 Waverly virtuallyherestudios.com-17
    - 3112 Waverly virtuallyherestudios.com-28
    - 3112 Waverly virtuallyherestudios.com-33
    - 3112 Waverly virtuallyherestudios.com-40
    - 3112 Waverly virtuallyherestudios.com-48
    - 3112 Waverly virtuallyherestudios.com-51
    - 3112 Waverly virtuallyherestudios.com-53
    - 3112 Waverly virtuallyherestudios.com-60
    - 3112 Waverly virtuallyherestudios.com-63

("Copyrighted Photographs 12") [Exhibit 12].

- 29. Copyrighted Photographs 12 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 30. On September 27, 2019, Alex Zarour captured the photographs:
    - 2226 N Berendo virtuallyherestudios.com-3
    - 2226 N Berendo virtuallyherestudios.com-11
    - 2226 N Berendo virtuallyherestudios.com-28

- 2226 N Berendo virtuallyherestudios.com-34
- 2226 N Berendo virtuallyherestudios.com-41
- 2226 N Berendo virtuallyherestudios.com-51
- 2226 N Berendo virtuallyherestudios.com-53
- 2226 N Berendo virtuallyherestudios.com-59
- 2226 N Berendo virtuallyherestudios.com-61
- 2226 N Berendo virtuallyherestudios.com-64
- 2226 N Berendo virtuallyherestudios.com-65
- 2226 N Berendo virtuallyherestudios.com-84
- 2226 N Berendo virtuallyherestudios.com-96
- 2226 N Berendo virtuallyherestudios.com-97
- 2226 N Berendo virtuallyherestudios.com-98

### ("Copyrighted Photographs 13") [Exhibit 13].

- 31. Copyrighted Photographs 13 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 32. On September 27, 2019, Alex Zarour captured the photographs:
    - 2226 N Berendo virtuallyherestudios.com-3
    - 2226 N Berendo virtuallyherestudios.com-11
    - 2226 N Berendo virtuallyherestudios.com-13
    - 2226 N Berendo virtuallyherestudios.com-24
    - 2226 N Berendo virtuallyherestudios.com-32
    - 2226 N Berendo virtuallyherestudios.com-34
    - 2226 N Berendo virtuallyherestudios.com-39

- 2226 N Berendo virtuallyherestudios.com-41
- 2226 N Berendo virtuallyherestudios.com-43
- 2226 N Berendo virtuallyherestudios.com-54
- 2226 N Berendo virtuallyherestudios.com-62
- 2226 N Berendo virtuallyherestudios.com-72
- 2226 N Berendo virtuallyherestudios.com-89
- 2226 N Berendo virtuallyherestudios.com-96
- 2226 N Berendo virtuallyherestudios.com-97
- 2226 N Berendo virtuallyherestudios.com-98
- 2226 N Berendo virtuallyherestudios.com-101
- 2226 N Berendo virtuallyherestudios.com-112
- 2226 N Berendo virtuallyherestudios.com-120

### ("Copyrighted Photographs 14") [Exhibit 14].

- 33. Copyrighted Photographs 14 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 34. On September 27, 2019, Alex Zarour captured the photographs:
    - 2226 N Berendo virtuallyherestudios.com-3
    - 2226 N Berendo virtuallyherestudios.com-8
    - 2226 N Berendo virtuallyherestudios.com-13
    - 2226 N Berendo virtuallyherestudios.com-28
    - 2226 N Berendo virtuallyherestudios.com-30
    - 2226 N Berendo virtuallyherestudios.com-32
    - 2226 N Berendo virtuallyherestudios.com-43

- 2226 N Berendo virtuallyherestudios.com-47
- 2226 N Berendo virtuallyherestudios.com-53
- 2226 N Berendo virtuallyherestudios.com-59
- 2226 N Berendo virtuallyherestudios.com-64
- 2226 N Berendo virtuallyherestudios.com-65
- 2226 N Berendo virtuallyherestudios.com-71
- 2226 N Berendo virtuallyherestudios.com-76
- 2226 N Berendo virtuallyherestudios.com-80
- 2226 N Berendo virtuallyherestudios.com-85
- 2226 N Berendo virtuallyherestudios.com-97
- 2226 N Berendo virtuallyherestudios.com-98
- 2226 N Berendo virtuallyherestudios.com-112
- 2226 N Berendo virtuallyherestudios.com-118
- 2226 N Berendo virtuallyherestudios.com-120

("Copyrighted Photographs 15") [Exhibit 15].

- 35. Copyrighted Photographs 15 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 36. On September 24, 2019, Alex Zarour captured the photographs:
    - 2200 Mountain Oak virtuallyherestudios.com-1
    - 2200 Mountain Oak virtuallyherestudios.com-13
    - 2200 Mountain Oak virtuallyherestudios.com-29

("Copyrighted Photographs 16") [Exhibit 16].

- 37. Copyrighted Photographs 16 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 38. On September 2, 2019, Alex Zarour captured the photographs:
    - 1716 Burnell Dr virtuallyherestudios.com-4
    - 1716 Burnell Dr virtuallyherestudios.com-15
    - 1716 Burnell Dr virtuallyherestudios.com-19
    - 1716 Burnell Dr virtuallyherestudios.com-22
    - 1716 Burnell Dr virtuallyherestudios.com-27
    - 1716 Burnell Dr virtuallyherestudios.com-28
    - 1716 Burnell Dr virtuallyherestudios.com-29
    - 1716 Burnell Dr virtuallyherestudios.com-36
    - 1716 Burnell Dr virtuallyherestudios.com-38
    - 1716 Burnell Dr virtuallyherestudios.com-40
    - 1716 Burnell Dr virtuallyherestudios.com-42
    - 1716 Burnell Dr virtuallyherestudios.com-44
    - 1716 Burnell Dr virtuallyherestudios.com-45
    - 1716 Burnell Dr virtuallyherestudios.com-46
    - 1716 Burnell Dr virtuallyherestudios.com-49
    - 1716 Burnell Dr virtuallyherestudios.com-53
    - 1716 Burnell Dr virtuallyherestudios.com-54

("Copyrighted Photographs 17") [Exhibit 17].

39. Copyrighted Photographs 17 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).

- 40. On September 2, 2019, Alex Zarour captured the photographs:
  - 8251 Skyline virtuallyherestudios.com-3
  - 8251 Skyline virtuallyherestudios.com-4
  - 8251 Skyline virtuallyherestudios.com-8
  - 8251 Skyline virtuallyherestudios.com-29
  - 8251 Skyline virtuallyherestudios.com-31
  - 8251 Skyline virtuallyherestudios.com-32
  - 8251 Skyline virtuallyherestudios.com-36
  - 8251 Skyline virtuallyherestudios.com-43
  - 8251 Skyline virtuallyherestudios.com-46
  - 8251 Skyline virtuallyherestudios.com-48
  - 8251 Skyline virtuallyherestudios.com-52
  - 8251 Skyline virtuallyherestudios.com-54
  - 8251 Skyline virtuallyherestudios.com-57
  - 8251 Skyline virtuallyherestudios.com-60
  - 8251 Skyline virtuallyherestudios.com-64
  - 8251 Skyline virtuallyherestudios.com-71
  - 8251 Skyline virtuallyherestudios.com-73

# ("Copyrighted Photographs 18") [Exhibit 18].

- 41. Copyrighted Photographs 18 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 42. On September 2, 2019, Alex Zarour captured the photographs:

- 2515 Glendower virtuallyherestudios.com-1
- 2515 Glendower virtuallyherestudios.com-5
- 2515 Glendower virtuallyherestudios.com-8
- 2515 Glendower virtuallyherestudios.com-9
- 2515 Glendower virtuallyherestudios.com-11
- 2515 Glendower virtuallyherestudios.com-14
- 2515 Glendower virtuallyherestudios.com-19
- 2515 Glendower virtuallyherestudios.com-24
- 2515 Glendower virtuallyherestudios.com-25
- 2515 Glendower virtuallyherestudios.com-26
- 2515 Glendower virtuallyherestudios.com-27
- 2515 Glendower virtuallyherestudios.com-30
- 2515 Glendower virtuallyherestudios.com-37
- 2515 Glendower virtuallyherestudios.com-101
- 2515 Glendower virtuallyherestudios.com-102
- 2515 Glendower virtuallyherestudios.com-103
- 2515 Glendower virtuallyherestudios.com-104

### ("Copyrighted Photographs 19") [Exhibit 19].

- 43. Copyrighted Photographs 19 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 44. On June 7, 2019, Alex Zarour captured the photographs:
    - 16452 Marbro virtuallyherestudios.com-3
    - 16452 Marbro virtuallyherestudios.com-10

- 16452 Marbro virtuallyherestudios.com-52
- 16452 Marbro virtuallyherestudios.com-57

("Copyrighted Photographs 20") [Exhibit 20].

- 45. Copyrighted Photographs 20 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 46. On May 22, 2019, Alex Zarour captured the photographs:
    - 1011 N Orange Grove #1 virtuallyherestudios.com-4
    - 1011 N Orange Grove #1 virtuallyherestudios.com-6
    - 1011 N Orange Grove #1 virtuallyherestudios.com-29
    - 1011 N Orange Grove #1 virtuallyherestudios.com-44

("Copyrighted Photographs 21") [Exhibit 21].

- 47. Copyrighted Photographs 21 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 48. On February 26, 2019, Alex Zarour captured the photographs:
    - 2539 Greenvalley virtuallyherestudios.com-1
    - 2539 Greenvalley virtuallyherestudios.com-2
    - 2539 Greenvalley virtuallyherestudios.com-3
    - 2539 Greenvalley virtuallyherestudios.com-11
    - 2539 Greenvalley virtuallyherestudios.com-12
    - 2539 Greenvalley virtuallyherestudios.com-15
    - 2539 Greenvalley virtuallyherestudios.com-20
    - 2539 Greenvalley virtuallyherestudios.com-21
    - 2539 Greenvalley virtuallyherestudios.com-22

- 2539 Greenvalley virtuallyherestudios.com-23
- 2539 Greenvalley virtuallyherestudios.com-24
- 2539 Greenvalley virtuallyherestudios.com-27
- 2539 Greenvalley virtuallyherestudios.com-28
- 2539 Greenvalley virtuallyherestudios.com-30

("Copyrighted Photographs 22") [Exhibit 22].

- 49. Copyrighted Photographs 22 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 50. On January 3, 2019, Alex Zarour captured the photographs:
    - Live Oak Circle virtuallyherestudios.com-1
    - Live Oak Circle virtuallyherestudios.com-2
    - Live Oak Circle virtuallyherestudios.com-3
    - Live Oak Circle virtuallyherestudios.com-5
    - Live Oak Circle virtuallyherestudios.com-7
    - Live Oak Circle virtuallyherestudios.com-9
    - Live Oak Circle virtuallyherestudios.com-12

("Copyrighted Photographs 23") [Exhibit 23].

- 51. Copyrighted Photographs 23 were registered by Alex Zarour with the United States Copyright Office on October 6, 2022 (Registration No.: VA0002322127).
  - 52. On November 23, 2020, Alex Zarour captured the photographs:
    - 2312 Baxter virtuallyherestudios.com-60
    - 2312 Baxter virtuallyherestudios.com-105

("Copyrighted Photographs 24") [Exhibit 24].

- 53. Copyrighted Photographs 24 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 54. On November 13, 2020, Alex Zarour captured the photographs:
    - 2117 Redrock Court virtuallyherestudios.com-1
    - 2117 Redrock Court virtuallyherestudios.com-2
    - 2117 Redrock Court virtuallyherestudios.com-3
    - 2117 Redrock Court virtuallyherestudios.com-6
    - 2117 Redrock Court virtuallyherestudios.com-8
    - 2117 Redrock Court virtuallyherestudios.com-10
    - 2117 Redrock Court virtuallyherestudios.com-11
    - 2117 Redrock Court virtuallyherestudios.com-13
    - 2117 Redrock Court virtuallyherestudios.com-16
    - 2117 Redrock Court virtuallyherestudios.com-17
    - 2117 Redrock Court virtuallyherestudios.com-18
    - 2117 Redrock Court virtuallyherestudios.com-21
    - 2117 Redrock Court virtuallyherestudios.com-25
    - 2117 Redrock Court virtuallyherestudios.com-31
    - 2117 Redrock Court virtuallyherestudios.com-35
    - 2117 Redrock Court virtuallyherestudios.com-48
    - 2117 Redrock Court virtuallyherestudios.com-54
    - 2117 Redrock Court virtuallyherestudios.com-55
    - 2117 Redrock Court virtuallyherestudios.com-62
    - 2117 Redrock Court virtuallyherestudios.com-64

("Copyrighted Photographs 25") [Exhibit 25].

- 55. Copyrighted Photographs 25 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 56. On October 26, 2020, Alex Zarour captured the photographs:
    - 4245 Don Alanis Place virtuallyherestudios.com-1
    - 4245 Don Alanis Place virtuallyherestudios.com-3
    - 4245 Don Alanis Place virtuallyherestudios.com-4
    - 4245 Don Alanis Place virtuallyherestudios.com-5
    - 4245 Don Alanis Place virtuallyherestudios.com-8
    - 4245 Don Alanis Place virtuallyherestudios.com-13
    - 4245 Don Alanis Place virtuallyherestudios.com-16
    - 4245 Don Alanis Place virtuallyherestudios.com-17
    - 4245 Don Alanis Place virtuallyherestudios.com-19
    - 4245 Don Alanis Place virtuallyherestudios.com-20
    - 4245 Don Alanis Place virtuallyherestudios.com-22
    - 4245 Don Alanis Place virtuallyherestudios.com-24
    - 4245 Don Alanis Place virtuallyherestudios.com-25
    - 4245 Don Alanis Place virtuallyherestudios.com-29

("Copyrighted Photographs 26") [Exhibit 26].

- 57. Copyrighted Photographs 26 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 58. On October 19, 2020, Alex Zarour captured the photographs:
    - 7411 Woodrow Wilson Dr virtuallyherestudios.com-1

- 7411 Woodrow Wilson Dr virtuallyherestudios.com-2
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-5
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-7
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-14
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-18
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-20
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-22
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-35
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-38
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-40
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-41
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-47
- 7411 Woodrow Wilson Dr virtuallyherestudios.com-50
- 7411 Woodrow Wilson Dr exteriors virtuallyherestudios.com-1
- 7411 Woodrow Wilson Dr exteriors virtuallyherestudios.com-4

("Copyrighted Photographs 27") [Exhibit 27].

- 59. Copyrighted Photographs 27 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 60. On October 15, 2020, Alex Zarour captured the photographs:
    - 2367 Ronda Vista Dr virtuallyherestudios.com-11
    - 2367 Ronda Vista Dr virtuallyherestudios.com-12
    - 2367 Ronda Vista Dr virtuallyherestudios.com-14
    - 2367 Ronda Vista Dr virtuallyherestudios.com-34

- 2367 Ronda Vista Dr virtuallyherestudios.com-40
- 2367 Ronda Vista Dr virtuallyherestudios.com-42
- 2367 Ronda Vista Dr virtuallyherestudios.com-43
- 2367 Ronda Vista Dr virtuallyherestudios.com-48
- 2367 Ronda Vista Dr virtuallyherestudios.com-49
- 2367 Ronda Vista Dr virtuallyherestudios.com-51
- 2367 Ronda Vista Dr virtuallyherestudios.com-58

### ("Copyrighted Photographs 28") [Exhibit 28].

- 61. Copyrighted Photographs 28 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 62. On October 1, 2020, Alex Zarour captured the photographs:
    - 2015 Whitley virtuallyherestudios.com-5
    - 2015 Whitley virtuallyherestudios.com-6
    - 2015 Whitley virtuallyherestudios.com-8
    - 2015 Whitley virtuallyherestudios.com-9
    - 2015 Whitley virtuallyherestudios.com-12
    - 2015 Whitley virtuallyherestudios.com-13
    - 2015 Whitley virtuallyherestudios.com-23
    - 2015 Whitley virtuallyherestudios.com-26
    - 2015 Whitley virtuallyherestudios.com-31
    - 2015 Whitley virtuallyherestudios.com-34
    - 2015 Whitley virtuallyherestudios.com-35
    - 2015 Whitley virtuallyherestudios.com-38

- 2015 Whitley virtuallyherestudios.com-39
- 2015 Whitley virtuallyherestudios.com-50
- 2015 Whitley virtuallyherestudios.com-51
- 2015 Whitley virtuallyherestudios.com-52
- 2015 Whitley virtuallyherestudios.com-53

("Copyrighted Photographs 29") [Exhibit 29].

- 63. Copyrighted Photographs 29 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 64. On September 19, 2020, Alex Zarour captured the photographs:
    - 6354 Bryn Mawr Drive virtuallyherestudios.com-1
    - 6354 Bryn Mawr Drive virtuallyherestudios.com-3
    - 6354 Bryn Mawr Drive virtuallyherestudios.com-28

("Copyrighted Photographs 30") [Exhibit 30].

- 65. Copyrighted Photographs 30 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 66. On August 22, 2020, Alex Zarour captured the photographs:
    - 3648 Sunswept virtuallyherestudios.com-1
    - 3648 Sunswept virtuallyherestudios.com-2
    - 3648 Sunswept virtuallyherestudios.com-10
    - 3648 Sunswept virtuallyherestudios.com-11
    - 3648 Sunswept virtuallyherestudios.com-13
    - 3648 Sunswept virtuallyherestudios.com-16
    - 3648 Sunswept virtuallyherestudios.com-19

- 3648 Sunswept virtuallyherestudios.com-24
- 3648 Sunswept virtuallyherestudios.com-41

("Copyrighted Photographs 31") [Exhibit 31].

- 67. Copyrighted Photographs 31 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).
  - 68. On August 17, 2020, Alex Zarour captured the photographs:
    - 401 N Croft Ave virtuallyherestudios.com-6
    - 401 N Croft Ave virtuallyherestudios.com-7
    - 401 N Croft Ave virtuallyherestudios.com-12
    - 401 N Croft Ave virtuallyherestudios.com-23
    - 401 N Croft Ave virtuallyherestudios.com-28
    - 401 N Croft Ave virtuallyherestudios.com-38
    - 401 N Croft Ave virtuallyherestudios.com-40
    - 401 N Croft Ave virtuallyherestudios.com-44
    - 401 N Croft Ave virtuallyherestudios.com-50
    - 401 N Croft Ave virtuallyherestudios.com-54
    - 401 N Croft Ave virtuallyherestudios.com-60
    - 401 N Croft Ave virtuallyherestudios.com-64
    - 401 N Croft Ave virtuallyherestudios.com-67
    - 401 N Croft Ave virtuallyherestudios.com-70

("Copyrighted Photographs 32") [Exhibit 32].

69. Copyrighted Photographs 32 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322131).

70. On July 27, 2020, Alex Zarour captured the photographs:

- 7031 Woodrow Wilson Dr virtuallyherestudios.com-1
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-3
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-4
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-7
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-9
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-11
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-13
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-15
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-20
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-21
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-25
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-26
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-27
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-31
- 7031 Woodrow Wilson Dr virtuallyherestudios.com-36
- Deck virtuallyherestudios.com-1

("Copyrighted Photographs 33") [Exhibit 33].

- 71. Copyrighted Photographs 33 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).
  - 72. On June 28, 2020, Alex Zarour captured the photographs:
  - 2401 N Vermont virtuallyherestudios.com-3
  - 2401 N Vermont virtuallyherestudios.com-5

- 2401 N Vermont virtuallyherestudios.com-7
- 2401 N Vermont virtuallyherestudios.com-9
- 2401 N Vermont virtuallyherestudios.com-12
- 2401 N Vermont virtuallyherestudios.com-13
- 2401 N Vermont virtuallyherestudios.com-16
- 2401 N Vermont virtuallyherestudios.com-19
- 2401 N Vermont virtuallyherestudios.com-21
- 2401 N Vermont virtuallyherestudios.com-29
- 2401 N Vermont virtuallyherestudios.com-31
- 2401 N Vermont virtuallyherestudios.com-38
- 2401 N Vermont virtuallyherestudios.com-41
- 2401 N Vermont virtuallyherestudios.com-43
- 2401 N Vermont virtuallyherestudios.com-52
- 2401 N Vermont virtuallyherestudios.com-54
- 2401 N Vermont virtuallyherestudios.com-59

## ("Copyrighted Photographs 34") [Exhibit 34].

73. Copyrighted Photographs 34were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).

74. On June 2, 2020, Alex Zarour captured the photographs:

- 2406 N Catalina St virtuallyherestudios.com-6
- 2406 N Catalina St virtuallyherestudios.com-9
- 2406 N Catalina St virtuallyherestudios.com-11
- 2406 N Catalina St virtuallyherestudios.com-12

- 2406 N Catalina St virtuallyherestudios.com-18
- 2406 N Catalina St virtuallyherestudios.com-20
- 2406 N Catalina St virtuallyherestudios.com-26
- 2406 N Catalina St virtuallyherestudios.com-28
- 2406 N Catalina St virtuallyherestudios.com-29
- 2406 N Catalina St virtuallyherestudios.com-40
- 2406 N Catalina St virtuallyherestudios.com-46
- 2406 N Catalina St virtuallyherestudios.com-52
- 2406 N Catalina St virtuallyherestudios.com-57
- 2406 N Catalina St virtuallyherestudios.com-58
- 2406 N Catalina St virtuallyherestudios.com-60

("Copyrighted Photographs 35") [Exhibit 35].

75. Copyrighted Photographs 35were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).

76. On June 2, 2020, Alex Zarour captured the photographs:

- 528 Hermosa virtuallyherestudios.com-59
- 528 Hermosa virtuallyherestudios.com-68
- 528 Hermosa virtuallyherestudios.com-73
- 528 Hermosa virtuallyherestudios.com-1
- 528 Hermosa virtuallyherestudios.com-5
- 528 Hermosa virtuallyherestudios.com-6
- 528 Hermosa virtuallyherestudios.com-10
- 528 Hermosa virtuallyherestudios.com-12

- 528 Hermosa virtuallyherestudios.com-16
- 528 Hermosa virtuallyherestudios.com-18
- 528 Hermosa virtuallyherestudios.com-19
- 528 Hermosa virtuallyherestudios.com-24
- 528 Hermosa virtuallyherestudios.com-26
- 528 Hermosa virtuallyherestudios.com-41
- 528 Hermosa virtuallyherestudios.com-46
- 528 Hermosa virtuallyherestudios.com-56
- 528 Hermosa virtuallyherestudios.com-57

("Copyrighted Photographs 36") [Exhibit 36].

77. Copyrighted Photographs 36were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).

78. On May 18, 2020, Alex Zarour captured the photographs:

- 12012 Crest Ct virtuallyherestudios.com-10
- 12012 Crest Ct virtuallyherestudios.com-11
- 12012 Crest Ct virtuallyherestudios.com-17
- 12012 Crest Ct virtuallyherestudios.com-18
- 12012 Crest Ct virtuallyherestudios.com-28
- 12012 Crest Ct virtuallyherestudios.com-43
- 12012 Crest Ct virtuallyherestudios.com-52
- 12012 Crest Ct virtuallyherestudios.com-66
- 12012 Crest Ct virtuallyherestudios.com-89
- 12012 Crest Ct virtuallyherestudios.com-93

("Copyrighted Photographs 37") [Exhibit 37].

- 79. Copyrighted Photographs 37 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).
  - 80. On March 22, 2020, Alex Zarour captured the photographs:
    - 3295 Bennett Dr virtuallyherestudios.com-5
    - 3295 Bennett Dr virtuallyherestudios.com-6
    - 3295 Bennett Dr virtuallyherestudios.com-16
    - 3295 Bennett Dr virtuallyherestudios.com-22
    - 3295 Bennett Dr virtuallyherestudios.com-33
    - 3295 Bennett Dr virtuallyherestudios.com-35
    - 3295 Bennett Dr virtuallyherestudios.com-39
    - 3295 Bennett Dr virtuallyherestudios.com-44
    - 3295 Bennett Dr virtuallyherestudios.com-45
    - 3295 Bennett Dr virtuallyherestudios.com-46
    - 3295 Bennett Dr virtuallyherestudios.com-51
    - 3295 Bennett Dr virtuallyherestudios.com-54
    - 3295 Bennett Dr virtuallyherestudios.com-61
    - 3295 Bennett Dr virtuallyherestudios.com-65
    - 3295 Bennett Dr virtuallyherestudios.com-72

# ("Copyrighted Photographs 38") [Exhibit 38].

- 81. Copyrighted Photographs 38 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).
  - 82. On February 23, 2020, Alex Zarour captured the photographs:

- 1267 Boston St virtuallyherestudios.com-8
- 1267 Boston St virtuallyherestudios.com-19
- 1267 Boston St virtuallyherestudios.com-21
- 1267 Boston St virtuallyherestudios.com-24
- 1267 Boston St virtuallyherestudios.com-30
- 1267 Boston St virtuallyherestudios.com-34
- 1267 Boston St virtuallyherestudios.com-42
- 1267 Boston St virtuallyherestudios.com-45
- 1267 Boston St virtuallyherestudios.com-49
- 1267 Boston St virtuallyherestudios.com-50

("Copyrighted Photographs 39") [Exhibit 39].

- 83. Copyrighted Photographs 39 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).
  - 84. On February 10, 2020, Alex Zarour captured the photographs:
    - 6342 Ivarene Ave virtuallyherestudios.com-2
    - 6342 Ivarene Ave virtuallyherestudios.com-4
    - 6342 Ivarene Ave virtuallyherestudios.com-6
    - 6342 Ivarene Ave virtuallyherestudios.com-9
    - 6342 Ivarene Ave virtuallyherestudios.com-10
    - 6342 Ivarene Ave virtuallyherestudios.com-17
    - 6342 Ivarene Ave virtuallyherestudios.com-20
    - 6342 Ivarene Ave virtuallyherestudios.com-23
    - 6342 Ivarene Ave virtuallyherestudios.com-28

- 6342 Ivarene Ave virtuallyherestudios.com-33
- 6342 Ivarene Ave virtuallyherestudios.com-53

("Copyrighted Photographs 40") [Exhibit 40].

- 85. Copyrighted Photographs 40 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).
  - 86. On January 28, 2020, Alex Zarour captured the photographs:
    - 2427 Ivan Hill virtuallyherestudios.com-2
    - 2427 Ivan Hill virtuallyherestudios.com-6
    - 2427 Ivan Hill virtuallyherestudios.com-9
    - 2427 Ivan Hill virtuallyherestudios.com-12
    - 2427 Ivan Hill virtuallyherestudios.com-17
    - 2427 Ivan Hill virtuallyherestudios.com-20
    - 2427 Ivan Hill virtuallyherestudios.com-26
    - 2427 Ivan Hill virtuallyherestudios.com-31
    - 2427 Ivan Hill virtuallyherestudios.com-32
    - 2427 Ivan Hill virtuallyherestudios.com-33
    - 2427 Ivan Hill virtuallyherestudios.com-34
    - 2427 Ivan Hill virtuallyherestudios.com-36
    - 2427 Ivan Hill virtuallyherestudios.com-38

("Copyrighted Photographs 41") [Exhibit 41].

- 87. Copyrighted Photographs 41 were registered by Alex Zarour with the United States Copyright Office on October 5, 2022 (Registration No.: VA0002322128).
  - 88. On December 28, 2021, Alex Zarour captured the photographs:

- 1654 Waterloo virtuallyherestudios.com-3
- 1654 Waterloo virtuallyherestudios.com-10
- 1654 Waterloo virtuallyherestudios.com-19
- 1654 Waterloo virtuallyherestudios.com-24
- 1654 Waterloo virtuallyherestudios.com-30
- 1654 Waterloo virtuallyherestudios.com-34
- 1654 Waterloo virtuallyherestudios.com-35
- 1654 Waterloo virtuallyherestudios.com-37

# ("Copyrighted Photographs 42") [Exhibit 42].

- 89. Copyrighted Photographs 42 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 90. November 14, 2021, Alex Zarour captured the photographs:
    - 3036 Castle virtuallyherestudios.com-1
    - 3036 Castle virtuallyherestudios.com-22
    - 3036 Castle virtuallyherestudios.com-43
    - 3036 Castle virtuallyherestudios.com-52
    - 3036 Castle virtuallyherestudios.com-54
    - 3036 Castle virtuallyherestudios.com-59
    - 3036 Castle virtuallyherestudios.com-63
    - 3036 Castle virtuallyherestudios.com-79
    - 3036 Castle virtuallyherestudios.com-80
    - 3036 Castle virtuallyherestudios.com-83

("Copyrighted Photographs 43") [Exhibit 43].

- 91. Copyrighted Photographs 43 were registered by Alex Zarour with the United States Copyright Office on September 5, 2022 (Registration No.: VA0002319303).
  - 92. On September 9, 2021, Alex Zarour captured the photographs:
    - 301 Copa De Oro virtuallyherestudios.com-11
    - 301 Copa De Oro virtuallyherestudios.com-13
    - 301 Copa De Oro virtuallyherestudios.com-19
    - 301 Copa De Oro virtuallyherestudios.com-28
    - 301 Copa De Oro virtuallyherestudios.com-32
    - 301 Copa De Oro virtuallyherestudios.com-39

("Copyrighted Photographs 44") [Exhibit 44].

- 93. Copyrighted Photographs 44 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 94. On August 18, 2021, Alex Zarour captured the photographs:
    - 3406 The Paseo virtuallyherestudios.com-2
    - 3406 The Paseo virtuallyherestudios.com-5
    - 3406 The Paseo virtuallyherestudios.com-7
    - 3406 The Paseo virtuallyherestudios.com-10
    - 3406 The Paseo virtuallyherestudios.com-23
    - 3406 The Paseo virtuallyherestudios.com-24
    - 3406 The Paseo virtuallyherestudios.com-27
    - 3406 The Paseo virtuallyherestudios.com-29
    - 3406 The Paseo virtuallyherestudios.com-30

- 3406 The Paseo virtuallyherestudios.com-35
- 3406 The Paseo virtuallyherestudios.com-41
- 3406 The Paseo virtuallyherestudios.com-44
- 3406 The Paseo virtuallyherestudios.com-46
- 3406 The Paseo virtuallyherestudios.com-47
- 3406 The Paseo virtuallyherestudios.com-52

("Copyrighted Photographs 45") [Exhibit 45].

- 95. Copyrighted Photographs 45 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 96. On August 15, 2021, Alex Zarour captured the photographs:
    - 2185 Mandeville virtuallyherestudios.com-3
    - 2185 Mandeville virtuallyherestudios.com-5
    - 2185 Mandeville virtuallyherestudios.com-8
    - 2185 Mandeville virtuallyherestudios.com-11
    - 2185 Mandeville virtuallyherestudios.com-15
    - 2185 Mandeville virtuallyherestudios.com-17
    - 2185 Mandeville virtuallyherestudios.com-19
    - 2185 Mandeville virtuallyherestudios.com-21
    - 2185 Mandeville virtuallyherestudios.com-24
    - 2185 Mandeville virtuallyherestudios.com-31
    - 2185 Mandeville virtuallyherestudios.com-34
    - 2185 Mandeville virtuallyherestudios.com-42
    - 2185 Mandeville virtuallyherestudios.com-58

- 2185 Mandeville virtuallyherestudios.com-60
- 2185 Mandeville virtuallyherestudios.com-67
- 2185 Mandeville virtuallyherestudios.com-71

("Copyrighted Photographs 46") [Exhibit 46].

- 97. Copyrighted Photographs 46 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 98. On July 27, 2021, Alex Zarour captured the photographs:
    - 710 Quail Drive virtuallyherestudios.com-5
    - 710 Quail Drive virtuallyherestudios.com-18
    - 710 Quail Drive virtuallyherestudios.com-29
    - 710 Quail Drive virtuallyherestudios.com-33
    - 710 Quail Drive virtuallyherestudios.com-34
    - 710 Quail Drive virtuallyherestudios.com-36
    - 710 Quail Drive virtuallyherestudios.com-39
    - 710 Quail Drive virtuallyherestudios.com-45
    - 710 Quail Drive virtuallyherestudios.com-52
    - drone virtuallyherestudios.com-1
    - drone virtuallyherestudios.com-4
    - drone virtuallyherestudios.com-5
    - drone virtuallyherestudios.com-6

("Copyrighted Photographs 47") [Exhibit 47].

99. Copyrighted Photographs 47 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).

- 100. On July 25, 2021, Alex Zarour captured the photographs:
  - 1027 Cove Way virtuallyherestudios.com-1
  - 1027 Cove Way virtuallyherestudios.com-3
  - 1027 Cove Way virtuallyherestudios.com-22
  - 1027 Cove Way virtuallyherestudios.com-26
  - 1027 Cove Way virtuallyherestudios.com-35
  - 1027 Cove Way virtuallyherestudios.com-49
  - 1027 Cove Way virtuallyherestudios.com-61
  - 1027 Cove Way virtuallyherestudios.com-73
  - 1027 Cove Way virtuallyherestudios.com-76
  - 1027 Cove Way virtuallyherestudios.com-78
  - 1027 Cove Way virtuallyherestudios.com-94
  - 1027 Cove Way virtuallyherestudios.com-96
  - 1027 Cove Way virtuallyherestudios.com-106
  - 1027 Cove Way virtuallyherestudios.com-108

# ("Copyrighted Photographs 48") [Exhibit 48].

- 101. Copyrighted Photographs 48 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 102. On July 8, 2021, Alex Zarour captured the photographs:
    - 2419 El Contento virtuallyherestudios.com-1
    - 2419 El Contento virtuallyherestudios.com-4
    - 2419 El Contento virtuallyherestudios.com-5
    - 2419 El Contento virtuallyherestudios.com-7

- 2419 El Contento virtuallyherestudios.com-14
- 2419 El Contento virtuallyherestudios.com-17
- 2419 El Contento virtuallyherestudios.com-21
- 2419 El Contento virtuallyherestudios.com-24
- 2419 El Contento virtuallyherestudios.com-25
- 2419 El Contento virtuallyherestudios.com-27
- 2419 El Contento virtuallyherestudios.com-35
- 2419 El Contento virtuallyherestudios.com-38
- 2419 El Contento virtuallyherestudios.com-42
- 2419 El Contento virtuallyherestudios.com-43

("Copyrighted Photographs 49") [Exhibit 49].

- 103. Copyrighted Photographs 49 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 104. On June 21, 2021, Alex Zarour captured the photographs:
    - 2151 Hollyridge Loop virtuallyherestudios.com-1
    - 2151 Hollyridge Loop virtuallyherestudios.com-3
    - 2151 Hollyridge Loop virtuallyherestudios.com-11
    - 2151 Hollyridge Loop virtuallyherestudios.com-19
    - 2151 Hollyridge Loop virtuallyherestudios.com-38
    - 2151 Hollyridge Loop virtuallyherestudios.com-42
    - 2151 Hollyridge Loop virtuallyherestudios.com-44
    - 2151 Hollyridge Loop virtuallyherestudios.com-45
    - 2151 Hollyridge Loop virtuallyherestudios.com-47

- 2151 Hollyridge Loop virtuallyherestudios.com-60
- 2151 Hollyridge Loop virtuallyherestudios.com-62
- 2151 Hollyridge Loop virtuallyherestudios.com-66
- 2151 Hollyridge Loop virtuallyherestudios.com-70
- 2151 Hollyridge Loop virtuallyherestudios.com-76
- 2151 Hollyridge Loop virtuallyherestudios.com-77
- 2151 Hollyridge Loop virtuallyherestudios.com-83
- 2151 Hollyridge Loop virtuallyherestudios.com-85

("Copyrighted Photographs 50") [Exhibit 50].

- 105. Copyrighted Photographs 50 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 106. On June 20, 2021, Alex Zarour captured the photographs:
    - 2002 La Brea Terrace virtuallyherestudios.com-1
    - 2002 La Brea Terrace virtuallyherestudios.com-6
    - 2002 La Brea Terrace virtuallyherestudios.com-8
    - 2002 La Brea Terrace virtuallyherestudios.com-12
    - 2002 La Brea Terrace virtuallyherestudios.com-13
    - 2002 La Brea Terrace virtuallyherestudios.com-15
    - 2002 La Brea Terrace virtuallyherestudios.com-22
    - 2002 La Brea Terrace virtuallyherestudios.com-26
    - 2002 La Brea Terrace virtuallyherestudios.com-27
    - 2002 La Brea Terrace virtuallyherestudios.com-32
    - 2002 La Brea Terrace virtuallyherestudios.com-33

- 2002 La Brea Terrace virtuallyherestudios.com-38
- 2002 La Brea Terrace virtuallyherestudios.com-41
- 2002 La Brea Terrace virtuallyherestudios.com-42
- 2002 La Brea Terrace virtuallyherestudios.com-44
- 2002 La Brea Terrace virtuallyherestudios.com-48
- 2002 La Brea Terrace virtuallyherestudios.com-52
- 2002 La Brea Terrace virtuallyherestudios.com-66

("Copyrighted Photographs 51") [Exhibit 51].

- 107. Copyrighted Photographs 51 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 108. On June 13, 2021, Alex Zarour captured the photographs:
    - 8663 Edwin Dr virtuallyherestudios.com-2
    - 8663 Edwin Dr virtuallyherestudios.com-4
    - 8663 Edwin Dr virtuallyherestudios.com-5
    - 8663 Edwin Dr virtuallyherestudios.com-7
    - 8663 Edwin Dr virtuallyherestudios.com-8
    - 8663 Edwin Dr virtuallyherestudios.com-10
    - 8663 Edwin Dr virtuallyherestudios.com-11
    - 8663 Edwin Dr virtuallyherestudios.com-14
    - 8663 Edwin Dr virtuallyherestudios.com-16
    - 8663 Edwin Dr virtuallyherestudios.com-17
    - 8663 Edwin Dr virtuallyherestudios.com-20
    - 8663 Edwin Dr virtuallyherestudios.com-25

- 8663 Edwin Dr virtuallyherestudios.com-29
- ("Copyrighted Photographs 52") [Exhibit 52].
- 109. Copyrighted Photographs 52 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - On June 8, 2021, Alex Zarour captured the photographs:
    - 1435 Crest Dr virtuallyherestudios.com-1
    - 1435 Crest Dr virtuallyherestudios.com-2
    - 1435 Crest Dr virtuallyherestudios.com-6
    - 1435 Crest Dr virtuallyherestudios.com-7
    - 1435 Crest Dr virtuallyherestudios.com-9
    - 1435 Crest Dr virtuallyherestudios.com-18
    - 1435 Crest Dr virtuallyherestudios.com-20
    - 1435 Crest Dr virtuallyherestudios.com-22
    - 1435 Crest Dr virtuallyherestudios.com-30
    - 1435 Crest Dr virtuallyherestudios.com-44
    - 1435 Crest Dr virtuallyherestudios.com-46
    - 1435 Crest Dr virtuallyherestudios.com-49
    - 1435 Crest Dr virtuallyherestudios.com-51
    - 1435 Crest Dr virtuallyherestudios.com-53
    - 1435 Crest Dr virtuallyherestudios.com-58
    - 1435 Crest Dr virtuallyherestudios.com-63

("Copyrighted Photographs 53") [Exhibit 53].

- 111. Copyrighted Photographs 53 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - On June 6, 2021, Alex Zarour captured the photographs:
    - 5906 Foothill Dr virtuallyherestudios.com-3
    - 5906 Foothill Dr virtuallyherestudios.com-6
    - 5906 Foothill Dr virtuallyherestudios.com-9
    - 5906 Foothill Dr virtuallyherestudios.com-10
    - 5906 Foothill Dr virtuallyherestudios.com-13
    - 5906 Foothill Dr virtuallyherestudios.com-19
    - 5906 Foothill Dr virtuallyherestudios.com-21
    - 5906 Foothill Dr virtuallyherestudios.com-22
    - 5906 Foothill Dr virtuallyherestudios.com-23
    - 5906 Foothill Dr virtuallyherestudios.com-26
    - 5906 Foothill Dr virtuallyherestudios.com-33
    - 5906 Foothill Dr virtuallyherestudios.com-37

("Copyrighted Photographs 54") [Exhibit 54].

- 113. Copyrighted Photographs 54 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - On May 23, 2021, Alex Zarour captured the photographs:
    - 8654 Edwin virtuallyherestudios.com-1
    - 8654 Edwin virtuallyherestudios.com-3
    - 8654 Edwin virtuallyherestudios.com-18

- 8654 Edwin virtuallyherestudios.com-21
- 8654 Edwin virtuallyherestudios.com-25
- 8654 Edwin virtuallyherestudios.com-27
- 8654 Edwin virtuallyherestudios.com-29
- 8654 Edwin virtuallyherestudios.com-34
- 8654 Edwin virtuallyherestudios.com-39
- 8654 Edwin virtuallyherestudios.com-44
- 8654 Edwin virtuallyherestudios.com-50
- 8654 Edwin virtuallyherestudios.com-59
- 8654 Edwin virtuallyherestudios.com-62
- 8654 Edwin virtuallyherestudios.com-65

("Copyrighted Photographs 55") [Exhibit 55].

- 115. Copyrighted Photographs 55 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321568).
  - 116. On May 19, 2021, Alex Zarour captured the photographs:
    - 1188 Hillcrest virtuallyherestudios.com-2
    - 1188 Hillcrest virtuallyherestudios.com-7
    - 1188 Hillcrest virtuallyherestudios.com-8
    - 1188 Hillcrest virtuallyherestudios.com-9
    - 1188 Hillcrest virtuallyherestudios.com-10
    - 1188 Hillcrest virtuallyherestudios.com-12
    - 1188 Hillcrest virtuallyherestudios.com-14
    - 1188 Hillcrest virtuallyherestudios.com-20

- 1188 Hillcrest virtuallyherestudios.com-25
- 1188 Hillcrest virtuallyherestudios.com-31
- 1188 Hillcrest virtuallyherestudios.com-34
- 1188 Hillcrest virtuallyherestudios.com-35
- 1188 Hillcrest virtuallyherestudios.com-42
- 1188 Hillcrest virtuallyherestudios.com-44

("Copyrighted Photographs 56") [Exhibit 56].

- 117. Copyrighted Photographs 56 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration Nos.: VA0002321568, VA0002321339).
  - 118. On May 13, 2021, Alex Zarour captured the photographs:
    - 145 N Rossmore virtuallyherestudios.com-1
    - 145 N Rossmore virtuallyherestudios.com-3
    - 145 N Rossmore virtuallyherestudios.com-6
    - 145 N Rossmore virtuallyherestudios.com-7
    - 145 N Rossmore virtuallyherestudios.com-10
    - 145 N Rossmore virtuallyherestudios.com-11
    - 145 N Rossmore virtuallyherestudios.com-14
    - 145 N Rossmore virtuallyherestudios.com-23
    - 145 N Rossmore virtuallyherestudios.com-26
    - 145 N Rossmore virtuallyherestudios.com-32
    - 145 N Rossmore virtuallyherestudios.com-43
    - 145 N Rossmore virtuallyherestudios.com-52

- 145 N Rossmore virtuallyherestudios.com-61
- 145 N Rossmore virtuallyherestudios.com-68

("Copyrighted Photographs 57") [Exhibit 57].

- 119. Copyrighted Photographs 57 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 120. On May 9, 2021, Alex Zarour captured the photographs:
    - 4313 Camellia virtuallyherestudios.com-1
    - 4313 Camellia virtuallyherestudios.com-7
    - 4313 Camellia virtuallyherestudios.com-8
    - 4313 Camellia virtuallyherestudios.com-12
    - 4313 Camellia virtuallyherestudios.com-13
    - 4313 Camellia virtuallyherestudios.com-17
    - 4313 Camellia virtuallyherestudios.com-20
    - 4313 Camellia virtuallyherestudios.com-22
    - 4313 Camellia virtuallyherestudios.com-23
    - 4313 Camellia virtuallyherestudios.com-26
    - 4313 Camellia virtuallyherestudios.com-35
    - 4313 Camellia virtuallyherestudios.com-37
    - 4313 Camellia virtuallyherestudios.com-43

("Copyrighted Photographs 58") [Exhibit 58].

- 121. Copyrighted Photographs 58 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 122. On April 29, 2021, Alex Zarour captured the photographs:

- 865 E Kensington Rd virtuallyherestudios.com-2
- 865 E Kensington Rd virtuallyherestudios.com-4
- 865 E Kensington Rd virtuallyherestudios.com-8
- 865 E Kensington Rd virtuallyherestudios.com-9
- 865 E Kensington Rd virtuallyherestudios.com-10
- 865 E Kensington Rd virtuallyherestudios.com-18
- 865 E Kensington Rd virtuallyherestudios.com-20
- 865 E Kensington Rd virtuallyherestudios.com-28
- 865 E Kensington Rd virtuallyherestudios.com-29
- 865 E Kensington Rd virtuallyherestudios.com-33
- 865 E Kensington Rd virtuallyherestudios.com-34
- 865 E Kensington Rd virtuallyherestudios.com-38
- 865 E Kensington Rd virtuallyherestudios.com-42
- 865 E Kensington Rd virtuallyherestudios.com-46
- 865 E Kensington Rd virtuallyherestudios.com-56
- 865 E Kensington Rd virtuallyherestudios.com-59
- 865 E Kensington Rd virtuallyherestudios.com-61

("Copyrighted Photographs 59") [Exhibit 59].

- 123. Copyrighted Photographs 59 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 124. On April 28, 2021, Alex Zarour captured the photographs:
    - 163 S Larchmont virtuallyherestudios.com-12
    - 163 S Larchmont virtuallyherestudios.com-17

- 163 S Larchmont virtuallyherestudios.com-19
- 163 S Larchmont virtuallyherestudios.com-21
- 163 S Larchmont virtuallyherestudios.com-23
- 163 S Larchmont virtuallyherestudios.com-34
- 163 S Larchmont virtuallyherestudios.com-39
- 163 S Larchmont virtuallyherestudios.com-43
- 163 S Larchmont virtuallyherestudios.com-44
- 163 S Larchmont virtuallyherestudios.com-48
- 163 S Larchmont virtuallyherestudios.com-61
- 163 S Larchmont virtuallyherestudios.com-62

("Copyrighted Photographs 60") [Exhibit 60].

- 125. Copyrighted Photographs 60 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 126. On April 28, 2021, Alex Zarour captured the photographs:
    - 1622 Poppy Peak virtuallyherestudios.com-1
    - 1622 Poppy Peak virtuallyherestudios.com-5
    - 1622 Poppy Peak virtuallyherestudios.com-6
    - 1622 Poppy Peak virtuallyherestudios.com-13
    - 1622 Poppy Peak virtuallyherestudios.com-14
    - 1622 Poppy Peak virtuallyherestudios.com-27
    - 1622 Poppy Peak virtuallyherestudios.com-34
    - 1622 Poppy Peak virtuallyherestudios.com-44
    - 1622 Poppy Peak virtuallyherestudios.com-45

- 1622 Poppy Peak virtuallyherestudios.com-46
- 1622 Poppy Peak virtuallyherestudios.com-49
- 1622 Poppy Peak virtuallyherestudios.com-50
- 1622 Poppy Peak virtuallyherestudios.com-53
- 1622 Poppy Peak virtuallyherestudios.com-60

# ("Copyrighted Photographs 61") [Exhibit 61].

- 127. Copyrighted Photographs 61 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 128. On April 18, 2021, Alex Zarour captured the photographs:
    - 3330 N Knoll Dr virtuallyherestudios.com-7
    - 3330 N Knoll Dr virtuallyherestudios.com-12
    - 3330 N Knoll Dr virtuallyherestudios.com-13
    - 3330 N Knoll Dr virtuallyherestudios.com-15
    - 3330 N Knoll Dr virtuallyherestudios.com-19
    - 3330 N Knoll Dr virtuallyherestudios.com-23
    - 3330 N Knoll Dr virtuallyherestudios.com-29
    - 3330 N Knoll Dr virtuallyherestudios.com-32
    - 3330 N Knoll Dr virtuallyherestudios.com-34
    - 3330 N Knoll Dr virtuallyherestudios.com-37
    - 3330 N Knoll Dr virtuallyherestudios.com-42
    - 3330 N Knoll Dr virtuallyherestudios.com-49
    - 3330 N Knoll Dr virtuallyherestudios.com-52
    - 3330 N Knoll Dr virtuallyherestudios.com-61

- Office virtuallyherestudios.com-1
- ("Copyrighted Photographs 62") [Exhibit 62].
- 129. Copyrighted Photographs 62 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 130. On April 12, 2021, Alex Zarour captured the photographs:
    - 2126 E Live Oak virtuallyherestudios.com-1
    - 2126 E Live Oak virtuallyherestudios.com-2
    - 2126 E Live Oak virtuallyherestudios.com-5
    - 2126 E Live Oak virtuallyherestudios.com-12
    - 2126 E Live Oak virtuallyherestudios.com-15
    - 2126 E Live Oak virtuallyherestudios.com-26
    - 2126 E Live Oak virtuallyherestudios.com-27
    - 2126 E Live Oak virtuallyherestudios.com-30
    - 2126 E Live Oak virtuallyherestudios.com-40
    - 2126 E Live Oak virtuallyherestudios.com-42
    - 2126 E Live Oak virtuallyherestudios.com-47
    - 2126 E Live Oak virtuallyherestudios.com-48
    - 2126 E Live Oak virtuallyherestudios.com-52
    - 2126 E Live Oak virtuallyherestudios.com-54
    - 2126 E Live Oak virtuallyherestudios.com-58
    - 2126 E Live Oak virtuallyherestudios.com-61
    - 2126 E Live Oak virtuallyherestudios.com-66

("Copyrighted Photographs 63") [Exhibit 63].

- 131. Copyrighted Photographs 63 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - On March 28, 2021, Alex Zarour captured the photographs:
    - 9080 Wonderland Park Ave virtuallyherestudios.com-3
    - 9080 Wonderland Park Ave virtuallyherestudios.com-6
    - 9080 Wonderland Park Ave virtuallyherestudios.com-9
    - 9080 Wonderland Park Ave virtuallyherestudios.com-11
    - 9080 Wonderland Park Ave virtuallyherestudios.com-13
    - 9080 Wonderland Park Ave virtuallyherestudios.com-14
    - 9080 Wonderland Park Ave virtuallyherestudios.com-16
    - 9080 Wonderland Park Ave virtuallyherestudios.com-30
    - 9080 Wonderland Park Ave virtuallyherestudios.com-31
    - 9080 Wonderland Park Ave virtuallyherestudios.com-33
    - 9080 Wonderland Park Ave virtuallyherestudios.com-36
    - 9080 Wonderland Park Ave virtuallyherestudios.com-37

### ("Copyrighted Photographs 64") [Exhibit 64].

- 133. Copyrighted Photographs 64 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - On March 22, 2021, Alex Zarour captured the photographs:
    - 5078 w 4th street virtuallyherestudios.com-3
    - 5078 w 4th street virtuallyherestudios.com-4
    - 5078 w 4th street virtuallyherestudios.com-50
    - 5078 w 4th street virtuallyherestudios.com-53

- 5078 w 4th street virtuallyherestudios.com-57
- 5078 w 4th street virtuallyherestudios.com-63
- 5078 w 4th street virtuallyherestudios.com-72
- 5078 w 4th street virtuallyherestudios.com-73

("Copyrighted Photographs 65") [Exhibit 65].

- 135. Copyrighted Photographs 65 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - On March 11, 2021, Alex Zarour captured the photographs:
    - 5134 Los Adornos Way virtuallyherestudios.com-1
    - 5134 Los Adornos Way virtuallyherestudios.com-5
    - 5134 Los Adornos Way virtuallyherestudios.com-6
    - 5134 Los Adornos Way virtuallyherestudios.com-17
    - 5134 Los Adornos Way virtuallyherestudios.com-20
    - 5134 Los Adornos Way virtuallyherestudios.com-25
    - 5134 Los Adornos Way virtuallyherestudios.com-28
    - 5134 Los Adornos Way virtuallyherestudios.com-32
    - 5134 Los Adornos Way virtuallyherestudios.com-33
    - 5134 Los Adornos Way virtuallyherestudios.com-45
    - 5134 Los Adornos Way virtuallyherestudios.com-50
    - 5134 Los Adornos Way virtuallyherestudios.com-56
    - 5134 Los Adornos Way virtuallyherestudios.com-57

("Copyrighted Photographs 66") [Exhibit 66].

- 137. Copyrighted Photographs 66 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - 138. On March 4, 2021, Alex Zarour captured the photographs:
    - 1801 Redcliff St virtuallyherestudios.com-1
    - 1801 Redcliff St virtuallyherestudios.com-3
    - 1801 Redcliff St virtuallyherestudios.com-7
    - 1801 Redcliff St virtuallyherestudios.com-9
    - 1801 Redcliff St virtuallyherestudios.com-17
    - 1801 Redcliff St virtuallyherestudios.com-19
    - 1801 Redcliff St virtuallyherestudios.com-20
    - 1801 Redcliff St virtuallyherestudios.com-25
    - 1801 Redcliff St virtuallyherestudios.com-27
    - 1801 Redcliff St virtuallyherestudios.com-30
    - 1801 Redcliff St virtuallyherestudios.com-31
    - 1801 Redcliff St virtuallyherestudios.com-32
    - 1801 Redcliff St virtuallyherestudios.com-33
    - 1801 Redcliff St virtuallyherestudios.com-38
    - 1801 Redcliff St virtuallyherestudios.com-40
    - 1801 Redcliff St virtuallyherestudios.com-43
    - 1801 Redcliff St virtuallyherestudios.com-44
    - 1801 Redcliff St virtuallyherestudios.com-46
    - 1801 Redcliff St virtuallyherestudios.com-47

("Copyrighted Photographs 67") [Exhibit 67].

- 139. Copyrighted Photographs 67 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - On March 4, 2021, Alex Zarour captured the photographs:
    - 440 N June virtuallyherestudios.com-1
    - 440 N June virtuallyherestudios.com-3
    - 440 N June virtuallyherestudios.com-16
    - 440 N June virtuallyherestudios.com-21
    - 440 N June virtuallyherestudios.com-22
    - 440 N June virtuallyherestudios.com-26
    - 440 N June virtuallyherestudios.com-29
    - 440 N June virtuallyherestudios.com-45
    - 440 N June virtuallyherestudios.com-46
    - 440 N June virtuallyherestudios.com-47

("Copyrighted Photographs 68") [Exhibit 68].

- 141. Copyrighted Photographs 68 were registered by Alex Zarour with the United States Copyright Office on October 4, 2022 (Registration No.: VA0002321339).
  - On November 16, 2022, Alex Zarour captured the photographs:
    - 4137 Mary Ellen Ave ©virtuallyherestudios.com-8
    - 4137 Mary Ellen Ave ©virtuallyherestudios.com-12
    - 4137 Mary Ellen Ave ©virtuallyherestudios.com-20
    - 4137 Mary Ellen Ave ©virtuallyherestudios.com-21
    - 4137 Mary Ellen Ave ©virtuallyherestudios.com-23
    - 4137 Mary Ellen Ave ©virtuallyherestudios.com-28

- 4137 Mary Ellen Ave ©virtuallyherestudios.com-35
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-49
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-55
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-58
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-63
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-68
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-71
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-72
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-91
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-93
- 4137 Mary Ellen Ave ©virtuallyherestudios.com-96

("Copyrighted Photographs 69") [Exhibit 69].

- 143. Copyrighted Photographs 69 were registered by Alex Zarour with the United States Copyright Office on March 9, 2023 (Registration No.: VA0002338886).
  - On December 5, 2022, Alex Zarour captured the photographs:
    - 3 Lida Ln ©virtuallyherestudios.com-1
    - 3 Lida Ln ©virtuallyherestudios.com-8
    - 3 Lida Ln ©virtuallyherestudios.com-10
    - 3 Lida Ln ©virtuallyherestudios.com-17
    - 3 Lida Ln ©virtuallyherestudios.com-21
    - 3 Lida Ln ©virtuallyherestudios.com-29
    - 3 Lida Ln ©virtuallyherestudios.com-30
    - 3 Lida Ln ©virtuallyherestudios.com-31

- 3 Lida Ln ©virtuallyherestudios.com-33
- 3 Lida Ln ©virtuallyherestudios.com-40
- 3 Lida Ln ©virtuallyherestudios.com-41
- 3 Lida Ln ©virtuallyherestudios.com-44
- 3 Lida Ln ©virtuallyherestudios.com-51

("Copyrighted Photographs 70") [Exhibit 70].

- 145. Copyrighted Photographs 70 were registered by Alex Zarour with the United States Copyright Office on March 5, 2023 (Registration No.: VA0002340662).
  - On November 22, 2022, Alex Zarour captured the photographs:
    - 2034 Castilian Dr ©virtuallyherestudios.com-17
    - 2034 Castilian Dr ©virtuallyherestudios.com-22
    - 2034 Castilian Dr ©virtuallyherestudios.com-27
    - 2034 Castilian Dr ©virtuallyherestudios.com-34
    - 2034 Castilian Dr ©virtuallyherestudios.com-39
    - 2034 Castilian Dr ©virtuallyherestudios.com-67
    - 2034 Castilian Dr ©virtuallyherestudios.com-68
    - 2034 Castilian Dr ©virtuallyherestudios.com-70
    - 2034 Castilian Dr ©virtuallyherestudios.com-71
    - 2034 Castilian Dr ©virtuallyherestudios.com-72
    - 2034 Castilian Dr ©virtuallyherestudios.com-74
    - 2034 Castilian Dr ©virtuallyherestudios.com-76
    - 2034 Castilian Dr ©virtuallyherestudios.com-82
    - 2034 Castilian Dr ©virtuallyherestudios.com-83

- 2034 Castilian Dr ©virtuallyherestudios.com-84
- 2034 Castilian Dr ©virtuallyherestudios.com-85

("Copyrighted Photographs 71") [Exhibit 71].

- 147. Copyrighted Photographs 71 were registered by Alex Zarour with the United States Copyright Office on June 5, 2023 (Registration No.: VA0002350470).
  - 148. On November 8, 2022, Alex Zarour captured the photographs:
    - 2630 Glendower ©virtuallyherestudios.com-1
    - 2630 Glendower ©virtuallyherestudios.com-5
    - 2630 Glendower ©virtuallyherestudios.com-6
    - 2630 Glendower ©virtuallyherestudios.com-8
    - 2630 Glendower ©virtuallyherestudios.com-11
    - 2630 Glendower ©virtuallyherestudios.com-14
    - 2630 Glendower ©virtuallyherestudios.com-20
    - 2630 Glendower ©virtuallyherestudios.com-23
    - 2630 Glendower ©virtuallyherestudios.com-26
    - 2630 Glendower ©virtuallyherestudios.com-30
    - 2630 Glendower ©virtuallyherestudios.com-40
    - 2630 Glendower ©virtuallyherestudios.com-42
    - 2630 Glendower ©virtuallyherestudios.com-52
    - 2630 Glendower ©virtuallyherestudios.com-53
    - 2630 Glendower ©virtuallyherestudios.com-54
    - 2630 Glendower ©virtuallyherestudios.com-61
    - 2630 Glendower ©virtuallyherestudios.com-62

- 2630 Glendower ©virtuallyherestudios.com-66
- 2630 Glendower ©virtuallyherestudios.com-67
- 2630 Glendower ©virtuallyherestudios.com-70
- 2630 Glendower ©virtuallyherestudios.com-71
- 2630 Glendower ©virtuallyherestudios.com-75
- 2630 Glendower ©virtuallyherestudios.com-76
- 2630 Glendower ©virtuallyherestudios.com-77

("Copyrighted Photographs 72") [Exhibit 72].

- 149. Copyrighted Photographs 72 were registered by Alex Zarour with the United States Copyright Office on March 9, 2023 (Registration No.: VA0002338886).
  - 150. On November 3, 2022, Alex Zarour captured the photographs:
    - 301 Lorraine ©virtuallyherestudios.com-2
    - 301 Lorraine ©virtuallyherestudios.com-4
    - 301 Lorraine ©virtuallyherestudios.com-6
    - 301 Lorraine ©virtuallyherestudios.com-7
    - 301 Lorraine ©virtuallyherestudios.com-8
    - 301 Lorraine ©virtuallyherestudios.com-10
    - 301 Lorraine ©virtuallyherestudios.com-3
    - 301 Lorraine ©virtuallyherestudios.com-28
    - 301 Lorraine ©virtuallyherestudios.com-30
    - 301 Lorraine ©virtuallyherestudios.com-46
    - 301 Lorraine ©virtuallyherestudios.com-48
    - 301 Lorraine ©virtuallyherestudios.com-50

- 301 Lorraine ©virtuallyherestudios.com-51
- 301 Lorraine ©virtuallyherestudios.com-52
- 301 Lorraine ©virtuallyherestudios.com-55
- 301 Lorraine ©virtuallyherestudios.com-56
- 301 Lorraine ©virtuallyherestudios.com-61

("Copyrighted Photographs 73") [Exhibit 73].

- 151. Copyrighted Photographs 73 were registered by Alex Zarour with the United States Copyright Office on December 12, 2022 (Registration No.: VA0002336082).
  - 152. On October 27, 2022, Alex Zarour captured the photographs:
    - 3842 Carnavon ©virtuallyherestudios.com-1
    - 3842 Carnavon ©virtuallyherestudios.com-2
    - 3842 Carnavon ©virtuallyherestudios.com-25
    - 3842 Carnavon ©virtuallyherestudios.com-28
    - 3842 Carnavon ©virtuallyherestudios.com-29
    - 3842 Carnavon ©virtuallyherestudios.com-31
    - 3842 Carnavon ©virtuallyherestudios.com-35
    - 3842 Carnavon ©virtuallyherestudios.com-40
    - 3842 Carnavon ©virtuallyherestudios.com-45
    - 3842 Carnavon ©virtuallyherestudios.com-46
    - 3842 Carnavon ©virtuallyherestudios.com-51
    - 3842 Carnavon ©virtuallyherestudios.com-56
    - 3842 Carnavon ©virtuallyherestudios.com-58

("Copyrighted Photographs 74") [Exhibit 74].

- 153. Copyrighted Photographs 74 were registered by Alex Zarour with the United States Copyright Office on December 12, 2022 (Registration No.: VA0002336082).
  - 154. On October 3, 2022, Alex Zarour captured the photographs:
    - 3817 Broadlawn virtuallyherestudios.com-1
    - 3817 Broadlawn virtuallyherestudios.com-4
    - 3817 Broadlawn virtuallyherestudios.com-7
    - 3817 Broadlawn virtuallyherestudios.com-2
    - 3817 Broadlawn virtuallyherestudios.com-15
    - 3817 Broadlawn virtuallyherestudios.com-20
    - 3817 Broadlawn virtuallyherestudios.com-23
    - 3817 Broadlawn virtuallyherestudios.com-27
    - 3817 Broadlawn virtuallyherestudios.com-28
    - 3817 Broadlawn virtuallyherestudios.com-37
    - 3817 Broadlawn virtuallyherestudios.com-41
    - 3817 Broadlawn virtuallyherestudios.com-45
    - 3817 Broadlawn virtuallyherestudios.com-47
    - 3817 Broadlawn virtuallyherestudios.com-55
    - 3817 Broadlawn virtuallyherestudios.com-57
    - 3817 Broadlawn virtuallyherestudios.com-59

("Copyrighted Photographs 75") [Exhibit 75].

- 155. Copyrighted Photographs 75 were registered by Alex Zarour with the United States Copyright Office on December 12, 2022 (Registration No.: VA0002336082).
  - 156. On September 26, 2022, Alex Zarour captured the photographs:

- 6620 Whitley Terrace virtuallyherestudios.com-1
- 6620 Whitley Terrace virtuallyherestudios.com-5
- 6620 Whitley Terrace virtuallyherestudios.com-6
- 6620 Whitley Terrace virtuallyherestudios.com-7
- 6620 Whitley Terrace virtuallyherestudios.com-8
- 6620 Whitley Terrace virtuallyherestudios.com-17
- 6620 Whitley Terrace virtuallyherestudios.com-22
- 6620 Whitley Terrace virtuallyherestudios.com-30
- 6620 Whitley Terrace virtuallyherestudios.com-44
- 6620 Whitley Terrace virtuallyherestudios.com-74

("Copyrighted Photographs 76") [Exhibit 76].

- 157. Copyrighted Photographs 76 were registered by Alex Zarour with the United States Copyright Office on December 11, 2022 (Registration No.: VA0002336043).
  - 158. On September 21, 2022, Alex Zarour captured the photographs:
    - 21 27th Ave ©virtuallyherestudios.com-2
    - 21 27th Ave ©virtuallyherestudios.com-7
    - 21 27th Ave ©virtuallyherestudios.com-15
    - 21 27th Ave ©virtuallyherestudios.com-23
    - 21 27th Ave ©virtuallyherestudios.com-30
    - 21 27th Ave ©virtuallyherestudios.com-32
    - 21 27th Ave ©virtuallyherestudios.com-34
    - 21 27th Ave ©virtuallyherestudios.com-51
    - 21 27th Ave ©virtuallyherestudios.com-55

- 21 27th Ave ©virtuallyherestudios.com-57 ("Copyrighted Photographs 77") [Exhibit 77].
- 159. Copyrighted Photographs 77 were registered by Alex Zarour with the United States Copyright Office on December 11, 2022 (Registration No.: VA0002336043).
  - 160. On September 12, 2022, Alex Zarour captured the photographs:
    - 7319 Birdview ©virtuallyherestudios.com-19
    - 7319 Birdview ©virtuallyherestudios.com-41
    - 7319 Birdview ©virtuallyherestudios.com-50
    - 7319 Birdview virtuallyherestudios.com-22
    - 7319 Birdview virtuallyherestudios.com-57
- ("Copyrighted Photographs 78") [Exhibit 78].
- 161. Copyrighted Photographs 78 were registered by Alex Zarour with the United States Copyright Office on September 19, 2022 (Registration No.: VA0002320844).
  - 162. On September 5, 2022, Alex Zarour captured the photographs:
    - 23500 Park Sorrento ©virtuallyherestudios.com-1
    - 23500 Park Sorrento ©virtuallyherestudios.com-5
    - 23500 Park Sorrento ©virtuallyherestudios.com-8
    - 23500 Park Sorrento ©virtuallyherestudios.com-9
    - 23500 Park Sorrento ©virtuallyherestudios.com-10
    - 23500 Park Sorrento ©virtuallyherestudios.com-13
    - 23500 Park Sorrento ©virtuallyherestudios.com-17
    - 23500 Park Sorrento ©virtuallyherestudios.com-23
    - 23500 Park Sorrento ©virtuallyherestudios.com-26

- 23500 Park Sorrento ©virtuallyherestudios.com-27
- 23500 Park Sorrento ©virtuallyherestudios.com-28
- 23500 Park Sorrento ©virtuallyherestudios.com-30
- 23500 Park Sorrento ©virtuallyherestudios.com-32

("Copyrighted Photographs 79") [Exhibit 79].

- 163. Copyrighted Photographs 79 were registered by Alex Zarour with the United States Copyright Office on September 19, 2022 (Registration No.: VA0002320844).
  - On July 12, 2022, Alex Zarour captured the photographs:
    - 7181 Chelan Way virtuallyherestudios.com-1
    - 7181 Chelan Way virtuallyherestudios.com-4
    - 7181 Chelan Way virtuallyherestudios.com-10
    - 7181 Chelan Way virtuallyherestudios.com-15
    - 7181 Chelan Way virtuallyherestudios.com-18
    - 7181 Chelan Way virtuallyherestudios.com-36
    - 7181 Chelan Way virtuallyherestudios.com-52
    - 7181 Chelan Way virtuallyherestudios.com-54

("Copyrighted Photographs 80") [Exhibit 80].

- 165. Copyrighted Photographs 80 were registered by Alex Zarour with the United States Copyright Office on September 22, 2022 (Registration No.: VA0002320705).
  - 166. On June 26, 2022, Alex Zarour captured the photographs:
    - 1035 Stradella virtuallyherestudios.com-1
    - 1035 Stradella virtuallyherestudios.com-3
    - 1035 Stradella virtuallyherestudios.com-5

- 1035 Stradella virtuallyherestudios.com-8
- 1035 Stradella virtuallyherestudios.com-10
- 1035 Stradella virtuallyherestudios.com-12
- 1035 Stradella virtuallyherestudios.com-13
- 1035 Stradella virtuallyherestudios.com-17
- 1035 Stradella virtuallyherestudios.com-19
- 1035 Stradella virtuallyherestudios.com-20

("Copyrighted Photographs 81") [Exhibit 81].

- 167. Copyrighted Photographs 81 were registered by Alex Zarour with the United States Copyright Office on September 19, 2022 (Registration No.: VA0002320844).
  - 168. On June 19, 2022, Alex Zarour captured the photographs:
  - 4415 W 5th St virtuallyherestudios.com-39
  - 4415 W 5th St virtuallyherestudios.com-43
  - 4415 W 5th St virtuallyherestudios.com-46

("Copyrighted Photographs 82") [Exhibit 82].

- 169. Copyrighted Photographs 82 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002350470).
  - 170. On June 8, 2022, Alex Zarour captured the photographs:
    - 5159 Varna virtuallyherestudios.com-1
    - 5159 Varna virtuallyherestudios.com-2
    - 5159 Varna virtuallyherestudios.com-4
    - 5159 Varna virtuallyherestudios.com-9
    - 5159 Varna virtuallyherestudios.com-21

- 5159 Varna virtuallyherestudios.com-24
- 5159 Varna virtuallyherestudios.com-32
- 5159 Varna virtuallyherestudios.com-40
- 5159 Varna virtuallyherestudios.com-48
- 5159 Varna virtuallyherestudios.com-55
- 5159 Varna virtuallyherestudios.com-61
- 5159 Varna virtuallyherestudios.com-63
- 5159 Varna virtuallyherestudios.com-66
- 5159 Varna virtuallyherestudios.com-69
- 5159 Varna virtuallyherestudios.com-73

("Copyrighted Photographs 83") [Exhibit 83].

- 171. Copyrighted Photographs 83 were registered by Alex Zarour with the United States Copyright Office on September 19, 2022 (Registration No.: VA0002320044).
  - On May 24, 2022, Alex Zarour captured the photographs:
    - 1032 W. Edgeware virtuallyherestudios.com-3
    - 1032 W. Edgeware virtuallyherestudios.com-12
    - 1032 W. Edgeware virtuallyherestudios.com-23
    - 1032 W. Edgeware virtuallyherestudios.com-27
    - 1032 W. Edgeware virtuallyherestudios.com-30
    - 1032 W. Edgeware virtuallyherestudios.com-37
    - 1032 W. Edgeware virtuallyherestudios.com-39
    - 1032 W. Edgeware virtuallyherestudios.com-42
    - 1032 W. Edgeware virtuallyherestudios.com-47

- 1032 W. Edgeware virtuallyherestudios.com-53
- 1032 W. Edgeware virtuallyherestudios.com-61
- 1032 W. Edgeware virtuallyherestudios.com-62
- 1032 W. Edgeware virtuallyherestudios.com-69
- 1032 W. Edgeware virtuallyherestudios.com-72
- 1032 W. Edgeware virtuallyherestudios.com-75

("Copyrighted Photographs 84") [Exhibit 84].

- 173. Copyrighted Photographs 84 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002320705).
  - On March 29, 2022, Alex Zarour captured the photographs:
    - 5531 Red Oak Dr virtuallyherestudios.com-1
    - 5531 Red Oak Dr virtuallyherestudios.com-5
    - 5531 Red Oak Dr virtuallyherestudios.com-6
    - 5531 Red Oak Dr virtuallyherestudios.com-9
    - 5531 Red Oak Dr virtuallyherestudios.com-17
    - 5531 Red Oak Dr virtuallyherestudios.com-21
    - 5531 Red Oak Dr virtuallyherestudios.com-23
    - 5531 Red Oak Dr virtuallyherestudios.com-24
    - 5531 Red Oak Dr virtuallyherestudios.com-29
    - 5531 Red Oak Dr virtuallyherestudios.com-34
    - 5531 Red Oak Dr virtuallyherestudios.com-53
    - 5531 Red Oak Dr virtuallyherestudios.com-58
    - 5531 Red Oak Dr virtuallyherestudios.com-61

- 5531 Red Oak Dr virtuallyherestudios.com-64
- 5531 Red Oak Dr virtuallyherestudios.com-67
- 5531 Red Oak Dr virtuallyherestudios.com-70
- 5531 Red Oak Dr virtuallyherestudios.com-72
- 5531 Red Oak Dr virtuallyherestudios.com-85
- 5531 Red Oak Dr virtuallyherestudios.com-87

("Copyrighted Photographs 85") [Exhibit 85].

- 175. Copyrighted Photographs 85 were registered by Alex Zarour with the United States Copyright Office on September 5, 2022 (Registration No.: VA0002317192).
  - 176. On March 10, 2022, Alex Zarour captured the photographs:
    - 5672 Valley Oak virtuallyherestudios.com-1
    - 5672 Valley Oak virtuallyherestudios.com-5
    - 5672 Valley Oak virtuallyherestudios.com-12
    - 5672 Valley Oak virtuallyherestudios.com-18
    - 5672 Valley Oak virtuallyherestudios.com-21
    - 5672 Valley Oak virtuallyherestudios.com-23
    - 5672 Valley Oak virtuallyherestudios.com-29
    - 5672 Valley Oak virtuallyherestudios.com-37
    - 5672 Valley Oak virtuallyherestudios.com-46
    - 5672 Valley Oak virtuallyherestudios.com-51
    - 5672 Valley Oak virtuallyherestudios.com-59
    - 5672 Valley Oak virtuallyherestudios.com-62
    - 5672 Valley Oak virtuallyherestudios.com-73

- 5672 Valley Oak virtuallyherestudios.com-81
- 5672 Valley Oak virtuallyherestudios.com-86
- 5672 Valley Oak virtuallyherestudios.com-88
- 5672 Valley Oak virtuallyherestudios.com-89
- 5672 Valley Oak virtuallyherestudios.com-91

("Copyrighted Photographs 86") [Exhibit 86].

- 177. Copyrighted Photographs 86 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002320705).
  - 178. On March 10, 2022, Alex Zarour captured the photographs:
    - 5672 Valley Oak virtuallyherestudios.com-1
    - 5672 Valley Oak virtuallyherestudios.com-5
    - 5672 Valley Oak virtuallyherestudios.com-12
    - 5672 Valley Oak virtuallyherestudios.com-14
    - 5672 Valley Oak virtuallyherestudios.com-19
    - 5672 Valley Oak virtuallyherestudios.com-24
    - 5672 Valley Oak virtuallyherestudios.com-33
    - 5672 Valley Oak virtuallyherestudios.com-45
    - 5672 Valley Oak virtuallyherestudios.com-51
    - 5672 Valley Oak virtuallyherestudios.com-67
    - 5672 Valley Oak virtuallyherestudios.com-73
    - 5672 Valley Oak virtuallyherestudios.com-74
    - 5672 Valley Oak virtuallyherestudios.com-80
    - 5672 Valley Oak virtuallyherestudios.com-86

- 5672 Valley Oak virtuallyherestudios.com-89
- 5672 Valley Oak virtuallyherestudios.com-96

("Copyrighted Photographs 87") [Exhibit 87].

- 179. Copyrighted Photographs 87 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002320705).
  - 180. On February 22, 2022, Alex Zarour captured the photographs:
    - 1320 Angelus St virtuallyherestudios.com-10
    - 1320 Angelus St virtuallyherestudios.com-17
    - 1320 Angelus St virtuallyherestudios.com-19
    - 1320 Angelus St virtuallyherestudios.com-1
    - 1320 Angelus St virtuallyherestudios.com-29
    - 1320 Angelus St virtuallyherestudios.com-30
    - 1320 Angelus St virtuallyherestudios.com-32
    - 1320 Angelus St virtuallyherestudios.com-34
    - 1320 Angelus St virtuallyherestudios.com-43
    - 1320 Angelus St virtuallyherestudios.com-45
    - 1320 Angelus St virtuallyherestudios.com-46

("Copyrighted Photographs 88") [Exhibit 88].

- 181. Copyrighted Photographs 88 were registered by Alex Zarour with the United States Copyright Office on June 5, 2022 (Registration No.: VA0002350470).
  - 182. On February 10, 2022, Alex Zarour captured the photographs:
    - 10252 La Canada Way virtuallyherestudios.com-7
    - 10252 La Canada Way virtuallyherestudios.com-12

- 10252 La Canada Way virtuallyherestudios.com-14
- 10252 La Canada Way virtuallyherestudios.com-18
- 10252 La Canada Way virtuallyherestudios.com-24
- 10252 La Canada Way virtuallyherestudios.com-38
- 10252 La Canada Way virtuallyherestudios.com-42
- 10252 La Canada Way virtuallyherestudios.com-54
- 10252 La Canada Way virtuallyherestudios.com-56
- 10252 La Canada Way virtuallyherestudios.com-59
- 10252 La Canada Way virtuallyherestudios.com-60
- 10252 La Canada Way virtuallyherestudios.com-62
- 10252 La Canada Way virtuallyherestudios.com-70

("Copyrighted Photographs 89") [Exhibit 89].

- 183. Copyrighted Photographs 89 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002320705).
  - 184. On February 7, 2022, Alex Zarour captured the photographs:
    - 6620 Whitley Terrace virtuallyherestudios.com-1
    - 6620 Whitley Terrace virtuallyherestudios.com-4
    - 6620 Whitley Terrace virtuallyherestudios.com-22
    - 6620 Whitley Terrace virtuallyherestudios.com-25
    - 6620 Whitley Terrace virtuallyherestudios.com-34
    - 6620 Whitley Terrace virtuallyherestudios.com-42
    - 6620 Whitley Terrace virtuallyherestudios.com-44
    - 6620 Whitley Terrace virtuallyherestudios.com-60

- 6620 Whitley Terrace virtuallyherestudios.com-64
- 6620 Whitley Terrace virtuallyherestudios.com-65
- 6620 Whitley Terrace virtuallyherestudios.com-71

("Copyrighted Photographs 90") [Exhibit 90].

- 185. Copyrighted Photographs 90 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002320705).
  - 186. On February 2, 2022, Alex Zarour captured the photographs:
    - 2862 Nichols Canyon virtuallyherestudios.com-2
    - 2862 Nichols Canyon virtuallyherestudios.com-4
    - 2862 Nichols Canyon virtuallyherestudios.com-12
    - 2862 Nichols Canyon virtuallyherestudios.com-14
    - 2862 Nichols Canyon virtuallyherestudios.com-24
    - 2862 Nichols Canyon virtuallyherestudios.com-29
    - 2862 Nichols Canyon virtuallyherestudios.com-46
    - 2862 Nichols Canyon virtuallyherestudios.com-53
    - 2862 Nichols Canyon virtuallyherestudios.com-62
    - 2862 Nichols Canyon virtuallyherestudios.com-65
    - 2862 Nichols Canyon virtuallyherestudios.com-69
    - 2862 Nichols Canyon virtuallyherestudios.com-72
    - 2862 Nichols Canyon virtuallyherestudios.com-78

("Copyrighted Photographs 91") [Exhibit 91].

187. Copyrighted Photographs 91 were registered by Alex Zarour with the United States Copyright Office on September 28, 2022 (Registration No.: VA0002320705).

- 188. On April 10, 2023, Alex Zarour captured the photographs:
  - 25919 Dark Creek Rd virtuallyherestudios.com-3
  - 25919 Dark Creek Rd virtuallyherestudios.com-7
  - 25919 Dark Creek Rd virtuallyherestudios.com-8
  - 25919 Dark Creek Rd virtuallyherestudios.com-11
  - 25919 Dark Creek Rd virtuallyherestudios.com-15
  - 25919 Dark Creek Rd virtuallyherestudios.com-16
  - 25919 Dark Creek Rd virtuallyherestudios.com-26
  - 25919 Dark Creek Rd virtuallyherestudios.com-40
  - 25919 Dark Creek Rd virtuallyherestudios.com-47
  - 25919 Dark Creek Rd virtuallyherestudios.com-48
  - 25919 Dark Creek Rd virtuallyherestudios.com-50

("Copyrighted Photographs 92") [Exhibit 92].

- 189. Copyrighted Photographs 92 were registered by Alex Zarour with the United States Copyright Office on July 4, 2023 (Registration No.: VA0002363676).
- 190. For all times relevant to this action, Plaintiff has been the author and exclusive copyright holder of all copyright rights in and to Copyrighted Photographs. As such, Plaintiff is entitled to institute and maintain this action for copyright infringement. See 17 U.S.C. § 501(b).

#### II. Defendant's Unlawful Activities

- 191. Defendant is an international media and entertainment company.
- 192. On October 12, 2018, Defendant published or caused to be published Copyrighted Photographs 1 to the following URLs:

- <a href="https://www.dirt.com/entertainers/reality-tv/jeff-lewis-los-angeles-flipping-out-1202978364">https://www.dirt.com/entertainers/reality-tv/jeff-lewis-los-angeles-flipping-out-1202978364</a>
- <a href="https://www.yahoo.com/entertainment/flipping-star-jeff-lewis-lists-180015174.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/flipping-star-jeff-lewis-lists-180015174.html?fr=sycsrp\_catchall</a>

# [Exhibit 93].

- 193. On April 2, 2019, Defendant published or caused to be published Copyrighted Photographs 2 to the following URLs:
  - <a href="https://www.dirt.com/more-dirt/real-estate-listings/alice-eve-selling-house-hollywood-1203457513">https://www.dirt.com/more-dirt/real-estate-listings/alice-eve-selling-house-hollywood-1203457513</a>
  - <a href="https://www.yahoo.com/entertainment/alice-eve-lists-bungalow-hollywood-163540863.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/alice-eve-lists-bungalow-hollywood-163540863.html?fr=sycsrp\_catchall</a>
  - https://ph.news.yahoo.com/alice-eve-lists-bungalow-hollywood-163540863.html
  - <a href="https://malaysia.news.yahoo.com/alice-eve-lists-bungalow-hollywood-163540863.html">https://malaysia.news.yahoo.com/alice-eve-lists-bungalow-hollywood-163540863.html</a>
  - <a href="https://ca.finance.yahoo.com/news/alice-eve-lists-bungalow-hollywood-163540863.html">https://ca.finance.yahoo.com/news/alice-eve-lists-bungalow-hollywood-163540863.html</a>
  - https://uk.sports.yahoo.com/news/alice-eve-lists-bungalow-hollywood-163540863.html
  - <a href="https://uk.finance.yahoo.com/news/alice-eve-lists-bungalow-hollywood-163540863.html">https://uk.finance.yahoo.com/news/alice-eve-lists-bungalow-hollywood-163540863.html</a>
  - https://uk.news.yahoo.com/alice-eve-lists-bungalow-hollywood-163540863.html
  - https://www.pinterest.com/pin/alice-eve-lists-1940s-bungalow-in-las-hollywood-dell--240661173825623694

## [Exhibit 94].

- 194. On October 18, 2018, Defendant published or caused to be published Copyrighted Photographs 3 to the following URLs:
  - <a href="https://www.dirt.com/gallery/showbiz/directors/christopher-landon-house-los-angeles-1203480770/christopherlandon\_ws12">https://www.dirt.com/gallery/showbiz/directors/christopher-landon-house-los-angeles-1203480770/christopherlandon\_ws12</a>

#### [Exhibit 95].

- 195. On June 21, 2018, Defendant published or caused to be published Copyrighted Photographs 4 to the following URLs:
  - https://www.dirt.com/showbiz/producers/alex-garcia-laurel-canyon-bungalow-1202853934
  - https://www.pinterest.com/pin/godzilla-producer-alex-garcia-lists-laurel-canyon-bungalow--132715520253742231
  - <a href="https://www.yahoo.com/entertainment/godzilla-producer-alex-garcia-lists-213109419.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/godzilla-producer-alex-garcia-lists-213109419.html?fr=sycsrp\_catchall</a>
  - <a href="https://uk.news.yahoo.com/godzilla-producer-alex-garcia-lists-213109419.html">https://uk.news.yahoo.com/godzilla-producer-alex-garcia-lists-213109419.html</a>
  - https://uk.sports.yahoo.com/news/godzilla-producer-alex-garcia-lists-213109419.html
  - https://uk.finance.yahoo.com/news/godzilla-producer-alex-garcia-lists-213109419.html
  - https://uk.movies.yahoo.com/godzilla-producer-alex-garcia-lists-213109419.html
  - <a href="https://uk.style.yahoo.com/godzilla-producer-alex-garcia-lists-213109419.html">https://uk.style.yahoo.com/godzilla-producer-alex-garcia-lists-213109419.html</a>

### [Exhibit 96].

196. On July 24, 2018, Defendant published or caused to be published Copyrighted Photographs 5 to the following URLs:

- https://www.dirt.com/more-dirt/real-estate-listings/naya-rivera-los-feliz-1203481101
- https://www.yahoo.com/entertainment/actress-naya-rivera-sells-artist-164524781.html?fr=sycsrp\_catchall
- https://uk.news.yahoo.com/actress-naya-rivera-sells-artist-164524781.html
- <a href="https://www.pinterest.com/pin/glee-actress-naya-rivera-sells-to-acclaimed-artist-lari-pittman--323766660707099945">https://www.pinterest.com/pin/glee-actress-naya-rivera-sells-to-acclaimed-artist-lari-pittman--323766660707099945</a>
- <a href="https://www.pinterest.com/pin/glee-actress-naya-rivera-sells-to-acclaimed-artist-lari-pittman--124200902208811689">https://www.pinterest.com/pin/glee-actress-naya-rivera-sells-to-acclaimed-artist-lari-pittman--124200902208811689</a>

## [Exhibit 97].

- 197. On May 7, 2018, Defendant published or caused to be published Copyrighted Photographs 6 to the following URLs:
  - https://www.dirt.com/showbiz/screenwriters/dave-goetsch-nichols-canyon-spanishbig-bang-theory-1202801813
  - <a href="https://www.yahoo.com/entertainment/sitcom-writer-producer-dave-goetsch-215145577.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/sitcom-writer-producer-dave-goetsch-215145577.html?fr=sycsrp\_catchall</a>
  - https://uk.news.yahoo.com/sitcom-writer-producer-dave-goetsch-215145577.html
  - https://www.pinterest.com/pin/spanish-exteriors--88594317658685299
  - https://www.pinterest.com/pin/511862313903612990
  - https://www.pinterest.co.uk/pin/sunnyslope-70s--511862313903612987

### [Exhibit 98].

- 198. On October 5, 2018, Defendant published or caused to be published Copyrighted Photographs 7 to the following URLs:
  - https://www.dirt.com/moguls/fashion/jerry-lorenzo-house-los-feliz-mansion-14091

## [Exhibit 99].

- 199. On April 3, 2018, Defendant published or caused to be published Copyrighted Photographs 8 to the following URLs:
  - <a href="https://www.dirt.com/more-dirt/real-estate-listings/don-henley-west-hollywood-bungalow-1203485968">https://www.dirt.com/more-dirt/real-estate-listings/don-henley-west-hollywood-bungalow-1203485968</a>
  - <a href="https://www.yahoo.com/entertainment/don-henley-picks-west-hollywood-163456089.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/don-henley-picks-west-hollywood-163456089.html?fr=sycsrp\_catchall</a>
  - <u>https://www.pinterest.com/pin/406872147580222267</u>
  - <u>https://www.pinterest.com/pin/406872147580222290</u>
  - https://www.pinterest.com/pin/306596687126759259
  - https://www.pinterest.co.uk/pin/don-henley-picks-up-west-hollywood-spanishbungalow--406872147580222290
  - https://www.pinterest.co.uk/pin/location-west-hollywood-calif-price-2212-million-size-1827-square-feet-3-bedrooms-2-bathrooms-406872147580222277
  - https://www.pinterest.co.uk/pin/don-henley-picks-up-west-hollywood-spanishbungalow--406872147580222296

# [Exhibit 100].

- 200. On November 12, 2019, Defendant published or caused to be published Copyrighted Photographs 9 to the following URLs:
  - <a href="https://www.dirt.com/entertainers/musicians/halsey-hollywood-hills-house-1203302302">https://www.dirt.com/entertainers/musicians/halsey-hollywood-hills-house-1203302302</a>
  - https://www.facebook.com/page/390531891586255/search/?q=halsey%20beachwood
     %20canyon

- <a href="https://www.yahoo.com/entertainment/halsey-records-beachwood-canyon-sale-163748600.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/halsey-records-beachwood-canyon-sale-163748600.html?fr=sycsrp\_catchall</a>
- <a href="https://www.yahoo.com/entertainment/halsey-lists-beachwood-canyon-architectural-171305361.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/halsey-lists-beachwood-canyon-architectural-171305361.html?fr=sycsrp\_catchall</a>
- https://uk.finance.yahoo.com/news/halsey-lists-beachwood-canyon-architectural-171305361.html
- https://uk.movies.yahoo.com/halsey-lists-beachwood-canyon-architectural-171305361.html
- https://uk.sports.yahoo.com/news/halsey-lists-beachwood-canyon-architectural-171305361.html
- https://ph.news.yahoo.com/halsey-lists-beachwood-canyon-architectural-171305361.html
- https://ca.news.yahoo.com/halsey-lists-beachwood-canyon-architectural-171305361.html

# [Exhibit 101].

- 201. On October 23, 2022, Defendant published or caused to be published Copyrighted Photographs 10 to the following URLs:
  - https://www.dirt.com/moguls/power-players/aaron-bay-schuck-house-beverly-hills-1203319915
  - https://www.facebook.com/page/390531891586255/search/?q=aron%20bay-schuck
  - https://www.pinterest.com/pin/455215474839798576
  - https://www.yahoo.com/entertainment/aaron-bay-schuck-upgrades-modernist-182125538.html?fr=sycsrp\_catchall

- https://ca.news.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html
- <a href="https://ph.news.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html">https://ph.news.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html</a>
- https://malaysia.news.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html
- Variety Yahoo <a href="https://uk.style.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html">https://uk.style.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html</a>
- https://uk.sports.yahoo.com/news/aaron-bay-schuck-upgrades-modernist-182125538.html
- <a href="https://uk.news.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html">https://uk.news.yahoo.com/aaron-bay-schuck-upgrades-modernist-182125538.html</a>
  [Exhibit 102].
- 202. On May 4, 2022, Defendant published or caused to be published Copyrighted Photographs 11 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/musicians/lizzo-house-beverly-hills-1203597093/aaron-bay-schuck-bh-1
  - https://twitter.com/DirtDotCom/status/1584686515472531456
  - https://twitter.com/SpyDotCom/status/1585029420313890816
  - https://www.instagram.com/p/CkHadxUK7K6

#### [Exhibit 103].

- 203. On January 22, 2020, Defendant published or caused to be published Copyrighted Photographs 12 to the following URLs:
  - https://www.dirt.com/entertainers/musicians/sarah-aarons-house-los-feliz-1203308069
  - https://www.facebook.com/page/390531891586255/search/?q=sarah%20aarons

- <a href="https://www.pinterest.co.uk/pin/106749453656574582">https://www.pinterest.co.uk/pin/106749453656574582</a>
- <a href="https://www.yahoo.com/entertainment/songwriter-sarah-aarons-buys-chic-212611251.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/songwriter-sarah-aarons-buys-chic-212611251.html?fr=sycsrp\_catchall</a>
- https://finance.yahoo.com/news/songwriter-sarah-aarons-buys-chic-212611251.html?fr=sycsrp\_catchall
- https://ca.finance.yahoo.com/news/songwriter-sarah-aarons-buys-chic-212611251.html
- <a href="https://ca.news.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html">https://ca.news.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html</a>
- <a href="https://uk.sports.yahoo.com/news/songwriter-sarah-aarons-buys-chic-212611251.html">https://uk.sports.yahoo.com/news/songwriter-sarah-aarons-buys-chic-212611251.html</a>
- <a href="https://uk.style.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html">https://uk.style.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html</a>
- https://uk.movies.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html
- https://uk.news.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html
- <a href="https://malaysia.news.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html">https://malaysia.news.yahoo.com/songwriter-sarah-aarons-buys-chic-212611251.html</a>
  [Exhibit 104].
- 204. On October 18, 2022, Defendant published or caused to be published Copyrighted Photographs 13 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/kate-mara-jamie-bell-house-los-feliz-1203595768/katemarajamiebellhouse\_lf1">https://www.dirt.com/gallery/entertainers/actors/kate-mara-jamie-bell-house-los-feliz-1203595768/katemarajamiebellhouse\_lf1</a>
  - https://www.facebook.com/page/390531891586255/search/?q=Los%20Angeles%20
     Colonial
  - https://www.pinterest.com/pin/22869910600717953
  - <a href="https://www.pinterest.co.uk/pin/kate-mara-jamie-bell-buy-neil-finns-elegant-southern-colonial-homestead--232498399506052472">https://www.pinterest.co.uk/pin/kate-mara-jamie-bell-buy-neil-finns-elegant-southern-colonial-homestead--232498399506052472</a>

https://www.linkedin.com/posts/wendy-bowman-595a785\_kate-mara-jamie-bell-buy-neil-finns-elegant-activity-6988585255880318976-dnKk

# [Exhibit 105].

- 205. On March 25, 2020, Defendant published or caused to be published Copyrighted Photographs 14 to the following URLs:
  - https://www.dirt.com/entertainers/musicians/neil-finn-house-los-angeles-1203315889
  - <a href="https://www.instagram.com/p/B-LQt8AHhAJ">https://www.instagram.com/p/B-LQt8AHhAJ</a>
  - <a href="https://newslettercollector.com/newsletter/dirt-com-newsletter-fleetwood-mac-s-neil-finn-goes-his-own-way-in-los-feliz-shia-labeouf-buys-in-pasadena">https://newslettercollector.com/newsletter/dirt-com-newsletter-fleetwood-mac-s-neil-finn-goes-his-own-way-in-los-feliz-shia-labeouf-buys-in-pasadena</a>
  - <a href="https://www.yahoo.com/entertainment/neil-finn-goes-own-way-221457002.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/neil-finn-goes-own-way-221457002.html?fr=sycsrp\_catchall</a>
  - https://ca.finance.yahoo.com/news/neil-finn-goes-own-way-221457002.html
  - https://malaysia.news.yahoo.com/neil-finn-goes-own-way-221457002.html
  - https://uk.news.yahoo.com/neil-finn-goes-own-way-221457002.html
  - https://uk.style.yahoo.com/neil-finn-goes-own-way-221457002.html
  - https://uk.sports.yahoo.com/news/neil-finn-goes-own-way-221457002.html
  - <a href="https://uk.finance.yahoo.com/news/neil-finn-goes-own-way-221457002.html">https://uk.finance.yahoo.com/news/neil-finn-goes-own-way-221457002.html</a>

#### [Exhibit 106].

- 206. On October 29, 2019, Defendant published or caused to be published Copyrighted Photographs 15 to the following URLs:
  - https://www.dirt.com/showbiz/screenwriters/tim-long-los-feliz-house-1203300757
  - <a href="https://www.yahoo.com/entertainment/comedy-writer-producer-tim-long-105139621.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/comedy-writer-producer-tim-long-105139621.html?fr=sycsrp\_catchall</a>

- <a href="https://malaysia.news.yahoo.com/comedy-writer-producer-tim-long-105139621.html">https://malaysia.news.yahoo.com/comedy-writer-producer-tim-long-105139621.html</a>
- https://uk.style.yahoo.com/comedy-writer-producer-tim-long-105139621.html
- <a href="https://uk.sports.yahoo.com/news/comedy-writer-producer-tim-long-105139621.html">https://uk.sports.yahoo.com/news/comedy-writer-producer-tim-long-105139621.html</a>
- https://uk.movies.yahoo.com/comedy-writer-producer-tim-long-105139621.html
- <a href="https://uk.news.yahoo.com/comedy-writer-producer-tim-long-105139621.html">https://uk.news.yahoo.com/comedy-writer-producer-tim-long-105139621.html</a>

# [Exhibit 107].

- 207. On June 3, 2021, Defendant published or caused to be published Copyrighted Photographs 16 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/directors/marc-webb-house-los-feliz-1203384674/marcwebbhouse\_lf1
  - #2 https://www.dirt.com/gallery/showbiz/directors/marc-webb-john-chernin-house-los-angeles-1203439103/marcwebbhouse\_lf1
  - https://www.facebook.com/page/390531891586255/search/?q=500%20days%20of%
     20summer
  - <u>https://www.pinterest.com/pin/33354853481119492</u>

#### [Exhibit 108].

- 208. On September 17, 2019, Defendant published or caused to be published Copyrighted Photographs 17 to the following URLs:
  - <a href="https://www.dirt.com/entertainers/actors/reno-wilson-mount-washington-house-1203294921">https://www.dirt.com/entertainers/actors/reno-wilson-mount-washington-house-1203294921</a>
  - https://www.instagram.com/p/B2mGmiWjHfy
  - https://www.facebook.com/page/390531891586255/search/?q=reno%20wilson

 https://www.yahoo.com/entertainment/reno-wilson-lists-mount-washington-175619773.html?fr=sycsrp\_catchall

#### [Exhibit 109].

- 209. On December 23, 2019, Defendant published or caused to be published Copyrighted Photographs 18 to the following URLs:
  - <a href="https://www.dirt.com/entertainers/actors/maria-bello-los-angeles-home-1203305427">https://www.dirt.com/entertainers/actors/maria-bello-los-angeles-home-1203305427</a>
  - <a href="https://www.instagram.com/p/B6bkAQMJgJd">https://www.instagram.com/p/B6bkAQMJgJd</a>
  - https://www.facebook.com/page/390531891586255/search/?q=maria%20bello
  - <a href="https://www.pinterest.com/pin/452259987582955155">https://www.pinterest.com/pin/452259987582955155</a>
  - https://www.pinterest.com/pin/452259987582955154
  - <a href="https://www.yahoo.com/entertainment/ncis-maria-bello-quietly-slides-203735035.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/ncis-maria-bello-quietly-slides-203735035.html?fr=sycsrp\_catchall</a>
  - https://ca.finance.yahoo.com/news/ncis-maria-bello-quietly-slides-203735035.html
  - https://ca.news.yahoo.com/ncis-maria-bello-quietly-slides-203735035.html
  - <a href="https://uk.movies.yahoo.com/ncis-maria-bello-quietly-slides-203735035.html">https://uk.movies.yahoo.com/ncis-maria-bello-quietly-slides-203735035.html</a>
  - https://uk.finance.yahoo.com/news/ncis-maria-bello-quietly-slides-203735035.html
  - https://uk.news.yahoo.com/ncis-maria-bello-quietly-slides-203735035.html
  - <a href="https://uk.sports.yahoo.com/news/ncis-maria-bello-quietly-slides-203735035.html">https://uk.sports.yahoo.com/news/ncis-maria-bello-quietly-slides-203735035.html</a>

#### [Exhibit 110].

- 210. On January 9, 2020, Defendant published or caused to be published Copyrighted Photographs 19 to the following URLs:
  - https://www.dirt.com/moguls/tech/jonah-peretti-house-los-feliz-1203306667
  - https://www.instagram.com/p/B7HDb7TJdQf

- <a href="https://www.facebook.com/page/390531891586255/search/?q=jonah%20peretti">https://www.facebook.com/page/390531891586255/search/?q=jonah%20peretti</a>
- https://finance.yahoo.com/news/buzzfeed-ceo-jonah-peretti-upgrades-181221198.html?fr=sycsrp\_catchall
- https://www.yahoo.com/entertainment/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html?fr=sycsrp\_catchall
- <a href="https://uk.sports.yahoo.com/news/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html">https://uk.sports.yahoo.com/news/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html</a>
- https://uk.finance.yahoo.com/news/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html
- https://uk.movies.yahoo.com/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html
- <a href="https://malaysia.news.yahoo.com/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html">https://malaysia.news.yahoo.com/buzzfeed-ceo-jonah-peretti-upgrades-181221754.html</a>
  [Exhibit 111].
- 211. On June 19, 2019, Defendant published or caused to be published Copyrighted Photographs 20 to the following URLs:
  - https://www.dirt.com/more-dirt/real-estate-listings/rachel-griffiths-encino-house-1203456725
  - <u>https://www.pinterest.com/pin/367254544613847573</u>
  - https://www.yahoo.com/entertainment/rachel-griffiths-aims-sell-encino-164550706.html?fr=sycsrp\_catchall
  - <a href="https://www.yahoo.com/entertainment/rachel-griffiths-lists-restored-updated-164529844.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/rachel-griffiths-lists-restored-updated-164529844.html?fr=sycsrp\_catchall</a>
  - <a href="https://ph.news.yahoo.com/rachel-griffiths-aims-sell-encino-164550706.html">https://ph.news.yahoo.com/rachel-griffiths-aims-sell-encino-164550706.html</a>
  - https://uk.sports.yahoo.com/news/rachel-griffiths-aims-sell-encino-164550706.html
  - https://uk.finance.yahoo.com/news/rachel-griffiths-aims-sell-encino-164550706.html
  - https://uk.news.yahoo.com/rachel-griffiths-aims-sell-encino-164550706.html

## [Exhibit 112].

- 212. On June 13, 2019, Defendant published or caused to be published Copyrighted Photographs 21 to the following URLs:
  - https://www.dirt.com/showbiz/screenwriters/steve-kloves-west-hollywood-1203242994
  - <a href="https://www.yahoo.com/entertainment/steve-kloves-lists-loft-style-235552391.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/steve-kloves-lists-loft-style-235552391.html?fr=sycsrp\_catchall</a>
  - https://finance.yahoo.com/news/steve-kloves-lists-loft-style-235552391.html
  - https://ph.news.yahoo.com/steve-kloves-lists-loft-style-235552391.html 29
  - <a href="https://ca.news.yahoo.com/steve-kloves-lists-loft-style-235552391.html">https://ca.news.yahoo.com/steve-kloves-lists-loft-style-235552391.html</a>
  - https://uk.sports.yahoo.com/news/steve-kloves-lists-loft-style-235552391.html

# [Exhibit 113].

- 213. On August 8, 2019, Defendant published or caused to be published Copyrighted Photographs 22 to the following URLs:
  - https://www.dirt.com/entertainers/actors/brie-larson-los-angeles-house-1203291524
  - https://www.instagram.com/p/B08yAP-A0FD
  - <a href="https://www.facebook.com/page/390531891586255/search/?q=Brie%20Larson%20se">https://www.facebook.com/page/390531891586255/search/?q=Brie%20Larson%20se</a>
    <a href="mailto:lls">lls</a>
  - <a href="https://www.yahoo.com/entertainment/brie-larson-loses-little-sale-214825473.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/brie-larson-loses-little-sale-214825473.html?fr=sycsrp\_catchall</a>
  - https://sg.news.yahoo.com/brie-larson-loses-little-sale-214825473.html
  - https://ph.news.yahoo.com/brie-larson-loses-little-sale-214825473.html
  - https://uk.sports.yahoo.com/news/brie-larson-loses-little-sale-214825473.html

- <a href="https://uk.news.yahoo.com/brie-larson-loses-little-sale-214825473.html">https://uk.news.yahoo.com/brie-larson-loses-little-sale-214825473.html</a>
- https://uk.finance.yahoo.com/news/brie-larson-loses-little-sale-214825473.html
- https://uk.movies.yahoo.com/brie-larson-loses-little-sale-214825473.html

# [Exhibit 114].

- 214. On May 21, 2019, Defendant published or caused to be published Copyrighted Photographs 23 to the following URLs:
  - https://www.dirt.com/entertainers/actors/nick-zano-mountain-retreat-1203222289
  - <a href="https://www.yahoo.com/entertainment/nick-zano-seeks-tenant-mountain-164559464.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/nick-zano-seeks-tenant-mountain-164559464.html?fr=sycsrp\_catchall</a>
  - https://ph.news.yahoo.com/nick-zano-seeks-tenant-mountain-164559464.html
  - https://ca.finance.yahoo.com/news/nick-zano-seeks-tenant-mountain-164559464.html
  - https://uk.sports.yahoo.com/news/nick-zano-seeks-tenant-mountain-164559464.html
  - https://uk.movies.yahoo.com/nick-zano-seeks-tenant-mountain-164559464.html
- <a href="https://uk.news.yahoo.com/nick-zano-seeks-tenant-mountain-164559464.html">https://uk.news.yahoo.com/nick-zano-seeks-tenant-mountain-164559464.html</a>
  [Exhibit 115].
- 215. On July 28, 2021, Defendant published or caused to be published Copyrighted Photographs 24 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/musicians/brent-kutzle-house-silver-lake-1203415424/brentkutzle\_sl2
  - https://www.yahoo.com/lifestyle/one-republic-brent-kutzle-pays-212229027.html?fr=sycsrp\_catchall
  - https://www.pinterest.com/pin/183521753558626984

 https://www.pinterest.co.uk/pin/brent-kutzle-buys-la-home-from-mark-duplass-dirt-183521753558626984

# [Exhibit 116].

- 216. On December 3, 2020, Defendant published or caused to be published Copyrighted Photographs 25 to the following URLs:
  - <a href="https://www.dirt.com/entertainers/actors/caterina-scorsone-los-angeles-home-1203354164">https://www.dirt.com/entertainers/actors/caterina-scorsone-los-angeles-home-1203354164</a>
  - <a href="https://www.instagram.com/p/CIejZbGD66D">https://www.instagram.com/p/CIejZbGD66D</a>
  - https://www.facebook.com/page/390531891586255/search/?q=caterina%20scorsone
  - https://www.pinterest.com/pin/42010209014040819
  - https://www.pinterest.com/pin/515943701066550837
  - https://www.pinterest.co.uk/pin/caterina-scorsone-lists-silver-lake-home-dirt-515943701066550837
  - <a href="https://www.yahoo.com/entertainment/grey-anatomy-star-caterina-scorsone-194614872.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/grey-anatomy-star-caterina-scorsone-194614872.html?fr=sycsrp\_catchall</a>
  - <a href="https://malaysia.news.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html">https://malaysia.news.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html</a>
  - https://ph.news.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html
  - https://ca.news.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html
  - <a href="https://ca.finance.yahoo.com/news/grey-anatomy-star-caterina-scorsone-194614872.html">https://ca.finance.yahoo.com/news/grey-anatomy-star-caterina-scorsone-194614872.html</a>
  - https://uk.movies.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html

- <a href="https://uk.sports.yahoo.com/news/grey-anatomy-star-caterina-scorsone-194614872.html">https://uk.sports.yahoo.com/news/grey-anatomy-star-caterina-scorsone-194614872.html</a>
- https://uk.news.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html
- <a href="https://uk.finance.yahoo.com/news/grey-anatomy-star-caterina-scorsone-194614872.html">https://uk.finance.yahoo.com/news/grey-anatomy-star-caterina-scorsone-194614872.html</a>
- <a href="https://uk.style.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html">https://uk.style.yahoo.com/grey-anatomy-star-caterina-scorsone-194614872.html</a>
  [Exhibit 117].
- 217. On December 23, 2020, Defendant published or caused to be published Copyrighted Photographs 26 to the following URLs:
  - <a href="https://www.dirt.com/more-dirt/design/ray-kappe-house-los-angeles-1203357477/">https://www.dirt.com/more-dirt/design/ray-kappe-house-los-angeles-1203357477/</a>
  - https://www.dirt.com/gallery/more-dirt/design/ray-kappe-house-los-angeles-1203356064/raykappe\_la/
  - <a href="https://www.instagram.com/p/CJUoHw1jtES/">https://www.instagram.com/p/CJUoHw1jtES/</a>
  - https://www.facebook.com/page/390531891586255/search/?q=ray%20kappe%20hits
     %20
  - https://www.yahoo.com/now/home-designed-ray-kappe-hits-173708516.html
  - https://www.yahoo.com/entertainment/home-designed-ray-kappe-hits-173708516.html?fr=sycsrp\_catchall
  - https://uk.finance.yahoo.com/news/home-designed-ray-kappe-hits-173708516.html
  - <a href="https://uk.movies.yahoo.com/home-designed-ray-kappe-hits-173708516.html">https://uk.movies.yahoo.com/home-designed-ray-kappe-hits-173708516.html</a>
  - https://ca.finance.yahoo.com/news/home-designed-ray-kappe-hits-173708516.html
  - <a href="https://ph.news.yahoo.com/home-designed-ray-kappe-hits-173708516.html">https://ph.news.yahoo.com/home-designed-ray-kappe-hits-173708516.html</a>

#### [Exhibit 118].

- 218. On November 23, 2020, Defendant published or caused to be published Copyrighted Photographs 27 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/directors/louis-leterrier-house-hollywood-hills-1203351883/louisleterrier\_hh1/
  - #2 <a href="https://www.dirt.com/showbiz/directors/louis-leterreier-house-los-angeles-1203352391/">https://www.dirt.com/showbiz/directors/louis-leterreier-house-los-angeles-1203352391/</a>
  - https://www.facebook.com/page/390531891586255/search/?q=louis%20leterrier
  - https://www.pinterest.com/pin/492651646744718129/
  - https://www.pinterest.com/pin/492651646744718143/
  - https://www.pinterest.co.uk/pin/inside-louis-leterriers-los-angeles-home-dirt-367817494574451630/
  - https://www.pinterest.co.uk/pin/inside-louis-leterriers-former-hollywood-hills-home--492651646744718143/
  - <a href="https://www.yahoo.com/entertainment/now-see-director-louis-leterrier-013057008.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/now-see-director-louis-leterrier-013057008.html?fr=sycsrp\_catchall</a>
  - https://ph.news.yahoo.com/now-see-director-louis-leterrier-013057008.html
  - https://uk.finance.vahoo.com/news/now-see-director-louis-leterrier-013057008.html
  - <a href="https://uk.movies.yahoo.com/now-see-director-louis-leterrier-013057008.html">https://uk.movies.yahoo.com/now-see-director-louis-leterrier-013057008.html</a>
  - <u>https://uk.sports.yahoo.com/news/now-see-director-louis-leterrier-013057008.html</u>

## [Exhibit 119].

219. On December 3, 2020, Defendant published or caused to be published Copyrighted Photographs 28 to the following URLs:

- https://www.dirt.com/gallery/more-dirt/heirs-heiresses/elizabeth-hilfiger-house-losfeliz-1203353493/elizabethhilfiger\_lf1/
- #2 https://www.dirt.com/more-dirt/heirs-heiresses/elizabeth-hilfiger-house-los-angeles-1203354217/#!
- https://www.facebook.com/page/390531891586255/search/?q=Elizabeth%20Hilfiger
- https://www.pinterest.com/pin/inside-elizabeth-hilfigers-los-feliz-midcentury--494692340328636613/
- <a href="https://www.pinterest.co.uk/pin/inside-elizabeth-hilfigers-los-feliz-midcentury-494692340328636613/">https://www.pinterest.co.uk/pin/inside-elizabeth-hilfigers-los-feliz-midcentury-494692340328636613/</a>
- <a href="https://www.yahoo.com/entertainment/elizabeth-hilfiger-designs-midcentury-modern-222059451.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/elizabeth-hilfiger-designs-midcentury-modern-222059451.html?fr=sycsrp\_catchall</a>
- https://ca.finance.yahoo.com/news/elizabeth-hilfiger-designs-midcentury-modern-222059451.html
- <a href="https://uk.sports.yahoo.com/news/elizabeth-hilfiger-designs-midcentury-modern-222059451.html">https://uk.sports.yahoo.com/news/elizabeth-hilfiger-designs-midcentury-modern-222059451.html</a>
- <a href="https://uk.news.yahoo.com/elizabeth-hilfiger-designs-midcentury-modern-222059451.html">https://uk.news.yahoo.com/elizabeth-hilfiger-designs-midcentury-modern-222059451.html</a>
- https://uk.finance.yahoo.com/news/elizabeth-hilfiger-designs-midcentury-modern-222059451.html

#### [Exhibit 120].

220. On December 16, 2020, Defendant published or caused to be published Copyrighted Photographs 29 to the following URLs:

- https://www.dirt.com/gallery/entertainers/actors/busy-philipps-hollywood-home-1203356467/busyphilipps\_hh4/
- https://www.facebook.com/page/390531891586255/search/?q=busy%20philipps%20
   hustles
- <a href="https://www.yahoo.com/entertainment/busy-philipps-hustles-hollywood-home-234109431.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/busy-philipps-hustles-hollywood-home-234109431.html?fr=sycsrp\_catchall</a>
- <a href="https://ph.news.yahoo.com/busy-philipps-hustles-hollywood-home-234109431.html">https://ph.news.yahoo.com/busy-philipps-hustles-hollywood-home-234109431.html</a>
- https://malaysia.news.yahoo.com/busy-philipps-hustles-hollywood-home-234109431.html
- https://uk.sports.yahoo.com/news/busy-philipps-hustles-hollywood-home-234109431.html
- <a href="https://uk.finance.yahoo.com/news/busy-philipps-hustles-hollywood-home-234109431.html">https://uk.finance.yahoo.com/news/busy-philipps-hustles-hollywood-home-234109431.html</a>

#### [Exhibit 121].

- 221. On September 14, 2022, Defendant published or caused to be published Copyrighted Photographs 30 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/ashley-tisdale-hollywood-hills-house-1203362984/sutherland\_tisdale2/">https://www.dirt.com/gallery/entertainers/actors/ashley-tisdale-hollywood-hills-house-1203362984/sutherland\_tisdale2/</a>
  - 2 <a href="https://www.dirt.com/gallery/entertainers/influencers/madison-beer-house-los-angeles-ashley-tisdale-1203581909/sutherland\_tisdale7/">https://www.dirt.com/gallery/entertainers/influencers/madison-beer-house-los-angeles-ashley-tisdale-1203581909/sutherland\_tisdale7/</a>
  - https://www.pinterest.com/pin/490610953166009483/
  - https://www.therichest.com/luxury-architecture/madison-beers-new-hollywood-hills-house-worth-5-9-million/

## [Exhibit 122].

- 222. On September 5, 2020, Defendant published or caused to be published Copyrighted Photographs 31 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/musicians/leona-lewis-house-studio-city-1203372124/leonalewis\_sc13/

#### [Exhibit 123].

- 223. On July 8, 2021, Defendant published or caused to be published Copyrighted Photographs 32 to the following URLs:
  - <a href="https://www.dirt.com/gallery/showbiz/directors/sophie-kargman-house-beverly-grove-los-angeles-1203390605/sophiekargmanhouse\_bg/">https://www.dirt.com/gallery/showbiz/directors/sophie-kargman-house-beverly-grove-los-angeles-1203390605/sophiekargmanhouse\_bg/</a>
  - <a href="https://www.pinterest.co.uk/pin/inside-director-sophie-kargmans-stylish-los-angeles-house-dirt--451978512612258392/">https://www.pinterest.co.uk/pin/inside-director-sophie-kargmans-stylish-los-angeles-house-dirt--451978512612258392/</a>
  - <a href="https://www.pinterest.co.uk/pin/inside-director-sophie-kargmans-stylish-los-angeles-house-dirt-486388828515141168/">https://www.pinterest.co.uk/pin/inside-director-sophie-kargmans-stylish-los-angeles-house-dirt-486388828515141168/</a>

#### [Exhibit 124].

- On August 13, 2020, Defendant published or caused to be published Copyrighted Photographs 33 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/gesner-boat-house-hollywood-hills-1203333057/gesnerboathouse\_hh1/
  - https://www.facebook.com/page/390531891586255/search/?q=Harry%20Gesnerdesigned%20%22boat%20houses%22
  - <a href="https://www.yahoo.com/entertainment/harry-gesner-designed-boat-house-110045251.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/harry-gesner-designed-boat-house-110045251.html?fr=sycsrp\_catchall</a>

- https://finance.yahoo.com/news/harry-gesner-designed-boat-house-110045251.html?fr=sycsrp\_catchall
- <a href="https://uk.movies.yahoo.com/harry-gesner-designed-boat-house-110045251.html">https://uk.movies.yahoo.com/harry-gesner-designed-boat-house-110045251.html</a>
- https://uk.sports.yahoo.com/news/harry-gesner-designed-boat-house-110045251.html
- https://uk.style.yahoo.com/harry-gesner-designed-boat-house-110045251.html
- https://uk.finance.yahoo.com/news/harry-gesner-designed-boat-house-110045251.html
- https://malaysia.news.yahoo.com/harry-gesner-designed-boat-house-110045251.html
- https://ca.finance.yahoo.com/news/harry-gesner-designed-boat-house-110045251.html

#### [Exhibit 125].

- 225. On December 2, 2020, Defendant published or caused to be published Copyrighted Photographs 34 to the following URLs:
  - https://www.dirt.com/entertainers/actors/freida-pinto-house-los-angeles-1203353719/
  - https://www.facebook.com/page/390531891586255/search/?q=freida%20pinto
  - https://www.pinterest.com/pin/861524603715032091/
  - <a href="https://www.yahoo.com/entertainment/freida-pinto-falls-genteel-traditional-062219197.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/freida-pinto-falls-genteel-traditional-062219197.html?fr=sycsrp\_catchall</a>
  - https://ca.news.yahoo.com/freida-pinto-falls-genteel-traditional-062219197.html
  - https://uk.style.yahoo.com/freida-pinto-falls-genteel-traditional-062219197.html
  - https://uk.movies.yahoo.com/freida-pinto-falls-genteel-traditional-062219197.html
  - https://uk.sports.yahoo.com/news/freida-pinto-falls-genteel-traditional-062219197.html

## [Exhibit 126].

- 226. On August 5, 2020, Defendant published or caused to be published Copyrighted Photographs 35 to the following URLs:
  - https://www.dirt.com/showbiz/entertainment-industry/nick-kroll-upgrades-to-1920sspanish-style-compound-1203332217/
  - <a href="https://www.instagram.com/p/CDsIgejAV43/">https://www.instagram.com/p/CDsIgejAV43/</a>
  - https://www.facebook.com/page/390531891586255/search/?q=showrunner%20nick
     %20kroll
  - <a href="https://www.yahoo.com/entertainment/nick-kroll-upgrades-1920s-spanish-005413940.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/nick-kroll-upgrades-1920s-spanish-005413940.html?fr=sycsrp\_catchall</a>
  - https://ph.news.yahoo.com/nick-kroll-upgrades-1920s-spanish-005413940.html
  - https://ca.news.yahoo.com/nick-kroll-upgrades-1920s-spanish-005413940.html
  - https://ca.finance.yahoo.com/news/nick-kroll-upgrades-1920s-spanish-005413940.html
  - https://uk.sports.yahoo.com/news/nick-kroll-upgrades-1920s-spanish-005413940.html
  - https://uk.finance.yahoo.com/news/nick-kroll-upgrades-1920s-spanish-005413940.html
- <a href="https://uk.style.yahoo.com/nick-kroll-upgrades-1920s-spanish-005413940.html">https://uk.style.yahoo.com/nick-kroll-upgrades-1920s-spanish-005413940.html</a>
  [Exhibit 127].
- 227. On December 10, 2020, Defendant published or caused to be published Copyrighted Photographs 36 to the following URLs:

- <a href="https://www.dirt.com/entertainers/influencers/elsa-hosk-house-south-pasadena-richard-neutra-1203355461/">https://www.dirt.com/entertainers/influencers/elsa-hosk-house-south-pasadena-richard-neutra-1203355461/</a>
- <a href="https://www.instagram.com/p/CI1umIbjDOu/">https://www.instagram.com/p/CI1umIbjDOu/</a>
- <a href="https://www.yahoo.com/entertainment/supermodel-elsa-hosk-catwalks-richard-181847145.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/supermodel-elsa-hosk-catwalks-richard-181847145.html?fr=sycsrp\_catchall</a>
- https://ca.news.yahoo.com/supermodel-elsa-hosk-catwalks-richard-181847145.html
- https://malaysia.news.yahoo.com/supermodel-elsa-hosk-catwalks-richard-181847145.html
- https://uk.finance.yahoo.com/news/supermodel-elsa-hosk-catwalks-richard-181847145.html
- https://uk.news.yahoo.com/supermodel-elsa-hosk-catwalks-richard-181847145.html
- https://uk.style.yahoo.com/supermodel-elsa-hosk-catwalks-richard-181847145.html
- https://uk.sports.yahoo.com/news/supermodel-elsa-hosk-catwalks-richard-181847145.html

#### [Exhibit 128].

- 228. On August 12, 2020, Defendant published or caused to be published Copyrighted Photographs 37 to the following URLs:
  - https://robbreport.com/shelter/homes-for-sale/home-tours-paris-beverly-hills-2942064/
  - <a href="https://www.yahoo.com/lifestyle/home-tours-12-4-million-163321771.html?fr=sycsrp\_catchall">https://www.yahoo.com/lifestyle/home-tours-12-4-million-163321771.html?fr=sycsrp\_catchall</a>
  - <a href="https://finance.yahoo.com/news/home-tours-12-4-million-163321771.html?fr=sycsrp\_catchall">https://finance.yahoo.com/news/home-tours-12-4-million-163321771.html?fr=sycsrp\_catchall</a>

- <a href="https://www.pinterest.co.uk/pin/98164466868953892/">https://www.pinterest.co.uk/pin/98164466868953892/</a>
- <a href="https://www.pinterest.co.uk/pin/inside-a-124-million-parisinspired-mansion-in-beverly-hills-robb-report--558868635013307315/">https://www.pinterest.co.uk/pin/inside-a-124-million-parisinspired-mansion-in-beverly-hills-robb-report--558868635013307315/</a>
- https://www.pinterest.com/pin/inside-a-124-million-parisinspired-mansion-in-beverly-hills-robb-report--558868635013307315/
- https://www.pinterest.com/pin/inside-a-124-million-parisinspired-mansion-in-beverly-hills-robb-report-421297740150413833/
- <a href="https://www.pinterest.com/pin/home-tours-this-124-million-beverly-hills-mansion-is-a-francophiles-dream--703406035543424621/">https://www.pinterest.com/pin/home-tours-this-124-million-beverly-hills-mansion-is-a-francophiles-dream--703406035543424621/</a>
- https://www.pinterest.com/pin/421297740150413833/
- https://www.pinterest.com/pin/48835977198904831/
- https://www.pinterest.com/pin/48835977198904830/

# [Exhibit 129].

- 229. On June 3, 2020, Defendant published or caused to be published Copyrighted Photographs 38 to the following URLs:
  - https://www.dirt.com/entertainers/musicians/matt-helders-house-los-angeles-1203323675/
  - https://www.facebook.com/page/390531891586255/search/?q=matt%20helders
  - https://news.knowledia.com/CA/en/articles/matt-helders-sells-hollywood-cottage-to-hurt-locker-producer-c41b17bd63da2c25555792cb1bf0c39bae40e111
  - <a href="https://www.yahoo.com/entertainment/matt-helders-sells-hollywood-cottage-183253969.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/matt-helders-sells-hollywood-cottage-183253969.html?fr=sycsrp\_catchall</a>

- https://finance.yahoo.com/news/matt-helders-sells-hollywood-cottage-183253969.html?fr=sycsrp\_catchall
- https://ca.finance.yahoo.com/news/matt-helders-sells-hollywood-cottage-183253969.html
- https://ca.news.yahoo.com/matt-helders-sells-hollywood-cottage-183253969.html
- <a href="https://uk.style.yahoo.com/matt-helders-sells-hollywood-cottage-183253969.html">https://uk.style.yahoo.com/matt-helders-sells-hollywood-cottage-183253969.html</a>
- https://uk.sports.yahoo.com/news/matt-helders-sells-hollywood-cottage-183253969.html
- https://uk.finance.yahoo.com/news/matt-helders-sells-hollywood-cottage-183253969.html
- https://uk.movies.yahoo.com/matt-helders-sells-hollywood-cottage-183253969.html
- https://uk.news.yahoo.com/matt-helders-sells-hollywood-cottage-183253969.html
- https://malaysia.news.yahoo.com/matt-helders-sells-hollywood-cottage-183253969.html

#### [Exhibit 130].

- 230. On May 21, 2020, Defendant published or caused to be published Copyrighted Photographs 39 to the following URLs:
  - https://www.dirt.com/showbiz/screenwriters/laura-solon-house-altadena-1203322189/
  - https://www.facebook.com/page/390531891586255/search/?q=laura%20solon
  - <a href="https://www.yahoo.com/entertainment/back-life-creator-laura-solon-162205882.html?fr=sycsrp\_catchall">https://www.yahoo.com/entertainment/back-life-creator-laura-solon-162205882.html?fr=sycsrp\_catchall</a>
  - https://ca.finance.yahoo.com/news/back-life-creator-laura-solon-162205882.html
  - https://ca.news.yahoo.com/back-life-creator-laura-solon-162205882.html

- https://uk.finance.yahoo.com/news/back-life-creator-laura-solon-162205882.html
- <a href="https://uk.sports.yahoo.com/news/back-life-creator-laura-solon-162205882.html">https://uk.sports.yahoo.com/news/back-life-creator-laura-solon-162205882.html</a>
- https://uk.news.yahoo.com/back-life-creator-laura-solon-162205882.html
- https://uk.style.yahoo.com/back-life-creator-laura-solon-162205882.html
- https://uk.movies.yahoo.com/back-life-creator-laura-solon-162205882.html
- https://malaysia.news.yahoo.com/back-life-creator-laura-solon-162205882.html

# [Exhibit 131].

- 231. On May 11, 2020, Defendant published or caused to be published Copyrighted Photographs 40 to the following URLs:
  - https://www.dirt.com/entertainers/actors/beth-behrs-los-angeles-house-1203320912/
- https://www.facebook.com/page/390531891586255/search/?q=beth%20behrs
   [Exhibit 132].
- 232. On March 26, 2020, Defendant published or caused to be published Copyrighted Photographs 41 to the following URLs:
  - https://www.dirt.com/entertainers/actors/james-jagger-los-angeles-house-1203315950/
  - https://www.instagram.com/p/B-N1gylArYm/
  - https://www.facebook.com/page/390531891586255/search/?q=james%20jagger
  - https://www.yahoo.com/entertainment/james-jagger-sells-silver-lake-175255738.html?fr=sycsrp\_catchall
  - https://finance.yahoo.com/news/james-jagger-sells-silver-lake-175255805.html?fr=sycsrp\_catchall
  - https://ca.news.yahoo.com/james-jagger-sells-silver-lake-175255738.html

- https://uk.style.yahoo.com/james-jagger-sells-silver-lake-175255805.html
- <a href="https://uk.sports.yahoo.com/news/james-jagger-sells-silver-lake-175255805.html">https://uk.sports.yahoo.com/news/james-jagger-sells-silver-lake-175255805.html</a>
- <a href="https://uk.news.yahoo.com/james-jagger-sells-silver-lake-175255805.html">https://uk.news.yahoo.com/james-jagger-sells-silver-lake-175255805.html</a>
- <a href="https://ph.news.yahoo.com/james-jagger-sells-silver-lake-175255805.html">https://ph.news.yahoo.com/james-jagger-sells-silver-lake-175255805.html</a>
  [Exhibit 133].
- 233. On February 18, 2022, Defendant published or caused to be published Copyrighted Photographs 42 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/musicians/brent-kutzle-house-los-angeles-one-republic-1203454503/brentkutzle\_sls1/">https://www.dirt.com/gallery/entertainers/musicians/brent-kutzle-house-los-angeles-one-republic-1203454503/brentkutzle\_sls1/</a>
  - <a href="https://www.pinterest.com/pin/506795764329622688/">https://www.pinterest.com/pin/506795764329622688/</a>

#### [Exhibit 134].

- 234. On March 5, 2022, Defendant published or caused to be published Copyrighted Photographs 43 to the following URLs:
  - https://www.dirt.com/gallery/moguls/tech/patreon-jack-conte-house-los-angeles-1203461879

#### [Exhibit 135].

- 235. On September 30, 2021, Defendant published or caused to be published Copyrighted Photographs 44 to the following URLs:
  - https://www.dirt.com/gallery/moguls/real-estate/yvonne-niami-house-bel-air-1203580189/yvonneniamihouse\_ba3

# [Exhibit 136].

236. On September 3, 2021, Defendant published or caused to be published Copyrighted Photographs 45 to the following URLs:

• <a href="https://www.dirt.com/gallery/entertainers/actors/reno-wilson-house-los-angeles-1203422482/renowilson\_gp2">https://www.dirt.com/gallery/entertainers/actors/reno-wilson-house-los-angeles-1203422482/renowilson\_gp2</a>

# [Exhibit 137].

- 237. On October 27, 2021, Defendant published or caused to be published Copyrighted Photographs 46 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/performers/chelsea-handler-house-brentwood-cheryl-hines-1203432922/chelseahandler\_bwmc2/">https://www.dirt.com/gallery/entertainers/performers/chelsea-handler-house-brentwood-cheryl-hines-1203432922/chelseahandler\_bwmc2/</a>
  - #2 https://www.dirt.com/gallery/entertainers/actors/cheryl-hines-house-los-angeles-1203418845/cherylhines\_bwmc5/
  - <a href="https://www.instagram.com/p/CVjUKLjPuC9/">https://www.instagram.com/p/CVjUKLjPuC9/</a>
  - https://www.facebook.com/dirt/posts/918793998760039
  - https://www.yahoo.com/lifestyle/chelsea-handler-picks-traditional-home-182209064.html?fr=sycsrp\_catchall
  - https://www.yahoo.com/lifestyle/cheryl-hines-buys-sells-l-232628538.html?fr=sycsrp\_catchall
  - https://www.pinterest.com/pin/83105555614633188/
  - https://www.pinterest.com/pin/444449056987439567/
  - https://www.pinterest.com/pin/408983209919247231/
  - https://www.pinterest.co.uk/pin/chelsea-handler-buys-la-house-from-cheryl-hinesdirt-in-2022--444449056987439567/
  - https://www.pinterest.co.uk/pin/chelsea-handler-buys-la-house-from-cheryl-hinesdirt--83105555614633188/

 https://www.pinterest.co.uk/pin/cheryl-hines-buys-and-sells-in-las-mandevillecanyon--408983209919247231/

# [Exhibit 138].

- 238. On September 9, 2021, Defendant published or caused to be published Copyrighted Photographs 47 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/jane-levy-house-hollywood-hills-1203422735/janelevyhouse\_mw2

#### [Exhibit 139].

- 239. On August 20, 2021, Defendant published or caused to be published Copyrighted Photographs 48 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/producers/megan-ellison-house-beverly-hills-1203419492/meganellison\_bhcw1/
  - https://www.yahoo.com/lifestyle/megan-ellison-asks-12-5-193354222.html
  - https://finance.yahoo.com/news/megan-ellison-asks-12-5-193354222.html?fr=sycsrp\_catchall

#### [Exhibit 140].

- 240. On October 19, 2021, Defendant published or caused to be published Copyrighted Photographs 49 to the following URLs:
  - https://www.dirt.com/gallery/moguls/fashion/hypland-jordan-bentley-house-losangeles-1203431272/bentley1/
  - https://www.yahoo.com/lifestyle/hypland-founder-jordan-bentley-goes-213538957.html
  - https://www.pinterest.com/pin/66217057013064832/

- <a href="https://www.pinterest.com/pin/66217057013064828/">https://www.pinterest.com/pin/66217057013064828/</a>
- <a href="https://www.pinterest.com/pin/66217057013064821/">https://www.pinterest.com/pin/66217057013064821/</a>
- <a href="https://www.pinterest.com/pin/66217057013064818/">https://www.pinterest.com/pin/66217057013064818/</a>
- https://www.pinterest.co.uk/pin/296674694213295544/

#### [Exhibit 141].

- 241. On August 17, 2021, Defendant published or caused to be published Copyrighted Photographs 50 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/danny-masterson-house-los-angeles-1203418765/dannymasterson\_hh1/">https://www.dirt.com/gallery/entertainers/actors/danny-masterson-house-los-angeles-1203418765/dannymasterson\_hh1/</a>
  - https://www.yahoo.com/lifestyle/multi-count-rape-trial-pending-191349863.html?fr=sycsrp\_catchall
  - https://finance.yahoo.com/news/multi-count-rape-trial-pending-191349863.html?fr=sycsrp\_catchall

#### [Exhibit 142].

- 242. On September 7, 2021, Defendant published or caused to be published Copyrighted Photographs 51 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/jane-levy-house-hollywood-hills-1203422735/janelevyhouse\_hh32/
  - <a href="https://www.yahoo.com/lifestyle/jane-levy-swaps-rustic-mount-012550617.html?fr=sycsrp\_catchall">https://www.yahoo.com/lifestyle/jane-levy-swaps-rustic-mount-012550617.html?fr=sycsrp\_catchall</a>

#### [Exhibit 143].

243. On September 30, 2021, Defendant published or caused to be published Copyrighted Photographs 52 to the following URLs:

 https://www.dirt.com/gallery/entertainers/actors/thomas-middleditch-househollywood-hills-1203436313/thomasmiddleditchhouse\_hh/

# [Exhibit 144].

- 244. On June 12, 2021, Defendant published or caused to be published Copyrighted Photographs 53 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/performers/riley-reid-house-altadena-1203386401/">https://www.dirt.com/gallery/entertainers/performers/riley-reid-house-altadena-1203386401/</a>
  - <a href="https://www.instagram.com/p/CQKRGtkDvi0/">https://www.instagram.com/p/CQKRGtkDvi0/</a>
- <a href="https://www.facebook.com/page/390531891586255/search/?q=onlyfans%20superstar">https://www.facebook.com/page/390531891586255/search/?q=onlyfans%20superstar</a>
  [Exhibit 145].
- 245. On July 23, 2021, Defendant published or caused to be published Copyrighted Photographs 54 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/annaleigh-ashford-house-hollywood-1203414844/annaleighashford\_hh1/
  - https://www.yahoo.com/lifestyle/broadway-star-annaleigh-ashford-goes-221524758.html?fr=sycsrp\_catchall

#### [Exhibit 146].

- 246. On August 25, 2021, Defendant published or caused to be published Copyrighted Photographs 55 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/musicians/prolific-pop-song-writer-producer-kid-harpoon-drops-3-8-million-on-hollywood-hills-home-1203420328/kidharpoon\_hh1/
  - https://www.yahoo.com/lifestyle/prolific-pop-song-writer-producer-193347292.html

 https://finance.yahoo.com/news/prolific-pop-song-writer-producer-193347292.html?fr=sycsrp\_catchall

#### [Exhibit 147].

- 247. On September 30, 2021, Defendant published or caused to be published Copyrighted Photographs 56 to the following URLs:
  - <a href="https://www.dirt.com/gallery/showbiz/studio-executives/warner-music-stephen-cooper-house-pasadena-1203389513/stephencooperhouse\_pd/">https://www.dirt.com/gallery/showbiz/studio-executives/warner-music-stephen-cooper-house-pasadena-1203389513/stephencooperhouse\_pd/</a>
  - https://www.realtor.com/news/celebrity-real-estate/anthony-russo-sells-blockbusterestate-in-pasadena/
  - https://www.realtor.com/news/celebrity-real-estate/anthony-russo-lists-historic-super-hero-home-in-pasadena/

# [Exhibit 148].

- 248. On September 10, 2021, Defendant published or caused to be published Copyrighted Photographs 57 to the following URLs:
  - <a href="https://www.dirt.com/gallery/more-dirt/real-estate-listings/brian-little-timothy-enright-house-hancock-park-los-angeles-1203389890/01-145-n-rossmore/">https://www.dirt.com/gallery/more-dirt/real-estate-listings/brian-little-timothy-enright-house-hancock-park-los-angeles-1203389890/01-145-n-rossmore/</a>

## [Exhibit 149].

- 249. On May 13, 2021, Defendant published or caused to be published Copyrighted Photographs 58 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/directors/mich-studio-city-home-1203380907/michaelshowalter\_sc1/
  - https://www.facebook.com/page/390531891586255/search/?q=michael%20showalter

- https://www.hollywoodreporter.com/lifestyle/real-estate/search-party-co-creator-michael-showalter-lists-studio-city-house-1234953765/#!
- https://www.imdb.com/news/ni63295819/

#### [Exhibit 150].

- 250. On May 7, 2021, Defendant published or caused to be published Copyrighted Photographs 59 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/design/william-hile-house-angelino-heights 1203379744/arthurbentonhouse\_ah16/
  - https://www.facebook.com/page/390531891586255/search/?q=colorful%201901
  - https://www.pinterest.com/pin/615163630356098953/
  - https://www.pinterest.com/pin/66217057012487379/

#### [Exhibit 151].

- 251. On September 30, 2021, Defendant published or caused to be published Copyrighted Photographs 60 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/adhir-kalyan-house-los-angeles-1203427665/adhirkalyan\_ws3/
  - https://news.yahoo.com/united-states-al-star-adhir-221131307.html
  - https://www.yahoo.com/lifestyle/united-states-al-star-adhir 221131307.html?fr=sycsrp\_catchall

## [Exhibit 152].

252. On May 6, 2021, Defendant published or caused to be published Copyrighted Photographs 61 to the following URLs:

- https://www.dirt.com/gallery/more-dirt/design/lyman-ennis-house-pasadena-1203379608/lymanennishouse\_pd3/
- <a href="https://www.facebook.com/page/390531891586255/search/?q=modernist%20pasaden">https://www.facebook.com/page/390531891586255/search/?q=modernist%20pasaden</a>
  a%20bungalow

# [Exhibit 153].

- 253. On April 21, 2021, Defendant published or caused to be published Copyrighted Photographs 62 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/juliette-lewis-house-hollywood-hills-1203377452/juliettelewishouse\_hh14/
  - https://www.facebook.com/page/390531891586255/search/?q=juliette%20lewis
  - https://www.pinterest.com/pin/506795764329506517/

# [Exhibit 154].

- 254. On April 22, 2021, Defendant published or caused to be published Copyrighted Photographs 63 to the following URLs:
  - <a href="https://www.dirt.com/gallery/showbiz/entertainment-industry/shana-feste-los-feliz-house-1203377573/shanafeste\_lf1/">https://www.dirt.com/gallery/showbiz/entertainment-industry/shana-feste-los-feliz-house-1203377573/shanafeste\_lf1/</a>

#### [Exhibit 155].

- 255. On April 20, 2021, Defendant published or caused to be published Copyrighted Photographs 64 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/producers/shaffner-stewart-house-laurelcanyon-1203377135/shaffnerstuarthouse-lc3/
  - https://www.facebook.com/page/390531891586255/search/?q=production%20design
     %20duo

## [Exhibit 156].

- 256. On September 9, 2021, Defendant published or caused to be published Copyrighted Photographs 65 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/producers/jamie-patricof-house-hancock-park-1203423913/jamiepatricofhouse\_hp/
  - <a href="https://www.pinterest.com/pin/722405596485678749/">https://www.pinterest.com/pin/722405596485678749/</a>

# [Exhibit 157].

- 257. On April 15, 2021, Defendant published or caused to be published Copyrighted Photographs 66 to the following URLs:
  - <a href="https://www.dirt.com/gallery/showbiz/directors/david-fincher-los-angeles-house-1203376343/davidfincher\_lfad3/">https://www.dirt.com/gallery/showbiz/directors/david-fincher-los-angeles-house-1203376343/davidfincher\_lfad3/</a>
  - <a href="https://www.instagram.com/p/CNyWsStjWK-/">https://www.instagram.com/p/CNyWsStjWK-/</a>
  - https://www.facebook.com/page/390531891586255/search/?q=david%20fincher
  - <a href="https://www.hollywoodreporter.com/lifestyle/style/david-fincher-and-cean-chaffin-buy-midcentury-house-4167312/#">https://www.hollywoodreporter.com/lifestyle/style/david-fincher-and-cean-chaffin-buy-midcentury-house-4167312/#</a>!
  - <a href="https://www.pinterest.co.uk/pin/david-fincher-and-cean-chaffin-add-rehabbed-midcentury-pavilion-to-property-portfolio--417075615499087843/">https://www.pinterest.co.uk/pin/david-fincher-and-cean-chaffin-add-rehabbed-midcentury-pavilion-to-property-portfolio--417075615499087843/</a>
  - https://www.imdb.com/news/ni63265373

#### [Exhibit 158].

- 258. On March 8, 2021, Defendant published or caused to be published Copyrighted Photographs 67 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/musicians/zack-de-la-rocha-house-silver-lake-1203367866/zackdelarocha\_sl/

https://www.facebook.com/page/390531891586255/search/?q=zack%20de%20la%20
 rocha

# [Exhibit 159].

- 259. On September 8, 2021, Defendant published or caused to be published Copyrighted Photographs 68 to the following URLs:
  - https://www.dirt.com/gallery/showbiz/studio-executives/david-greenbaum-househancock-park-1203422598/
  - https://www.yahoo.com/lifestyle/searchlight-pictures-prez-buys-fully-171203646.html?fr=sycsrp\_catchall
  - https://www.pinterest.co.uk/pin/inside-david-greenbaums-lavish-hancock-park-house-dirt--294422894400730562/

# [Exhibit 160].

- 260. On March 29, 2023, Defendant published or caused to be published Copyrighted Photographs 69 to the following URLs:
  - <a href="https://www.dirt.com/gallery/athletes/sports-stars/freddie-freeman-house-studio-city-1203627262/freddiefreemanhouse-sc2/">https://www.dirt.com/gallery/athletes/sports-stars/freddie-freeman-house-studio-city-1203627262/freddiefreemanhouse-sc2/</a>
  - <a href="https://www.instagram.com/p/Cqbh91\_y6zG/">https://www.instagram.com/p/Cqbh91\_y6zG/</a>

#### [Exhibit 161].

- 261. On January 7, 2023, Defendant published or caused to be published Copyrighted Photographs 70 to the following URLs:
  - <a href="https://www.dirt.com/gallery/more-dirt/real-estate-listings/floyd-mueller-midcentury-modern-home-for-sale-pasadena-1203611332/3-lida-ln-mls02-2/">https://www.dirt.com/gallery/more-dirt/real-estate-listings/floyd-mueller-midcentury-modern-home-for-sale-pasadena-1203611332/3-lida-ln-mls02-2/</a>

# [Exhibit 162].

- 262. On December 13, 2022, Defendant published or caused to be published Copyrighted Photographs 71 to the following URLs:
  - <a href="https://www.dirt.com/gallery/showbiz/directors/mash-director-gene-reynolds-house-hollywood-hills-home-outpost-1203606767/genereynolds\_hh17/">https://www.dirt.com/gallery/showbiz/directors/mash-director-gene-reynolds-house-hollywood-hills-home-outpost-1203606767/genereynolds\_hh17/</a>

# [Exhibit 163].

- 263. On November 15, 2022, Defendant published or caused to be published Copyrighted Photographs 72 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/af-leicht-castle-los-feliz-los-angeles-1203601335/
  - https://www.dirt.com/gallery/more-dirt/artists/artist-jonas-wood-house-los-feliz-1203613115/
  - https://www.pinterest.com/pin/interiorexterior--66217057014374786/
  - https://robbreport.com/shelter/celebrity-homes/flea-art-nouveau-mansion-1234772700

#### [Exhibit 164].

- 264. On October 12, 2018, Defendant published or caused to be published Copyrighted Photographs 73 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/century-old-craftsman-house-windsor-square-1203602262/

#### [Exhibit 165].

265. On November 8, 2022, Defendant published or caused to be published Copyrighted Photographs 74 to the following URLs:

- https://www.dirt.com/gallery/entertainers/actors/elizabeth-reaser-house-los-feliz-1203599838/elizabethreaserhouse\_lf14/
- https://www.pinterest.co.uk/pin/232498399506130184/

#### [Exhibit 166].

- 266. On October 7, 2022, Defendant published or caused to be published Copyrighted Photographs 75 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/streamline-moderne-house-william-kesling-hollywood-hills-1203590972/kesling\_estes4/

# [Exhibit 167].

- 267. On October 30, 2022, Defendant published or caused to be published Copyrighted Photographs 76 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/laura-harrier-house-hollywood-hills-1203598174/lauraharrierhouse">https://www.dirt.com/gallery/entertainers/actors/laura-harrier-house-hollywood-hills-1203598174/lauraharrierhouse</a> hh7-2/
  - https://www.pinterest.com/pin/767652699000554659/
  - https://realproperty.news/mike-star-laura-harrier-lists-los-angeles-house-dirt-82192.html

#### [Exhibit 168].

- 268. On October 7, 2022, Defendant published or caused to be published Copyrighted Photographs 77 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/charlie-sutherland-designed-house-venice-california-1203590692/charliesutherlandhouse\_vn\_20/
  - <a href="https://www.newscon.net/modern-house-by-uk-architect-lists-in-los-angeles/?hl=en">https://www.newscon.net/modern-house-by-uk-architect-lists-in-los-angeles/?hl=en</a>
  - https://www.pinterest.com/pin/232498399506003478/

## [Exhibit 169].

- 269. On September 29, 2022, Defendant published or caused to be published Copyrighted Photographs 78 to the following URLs:
  - https://www.dirt.com/gallery/moguls/fashion/apparel-mogul-house-malibu-realaccone-vince-1203582168/realaccone\_malpd1/

#### [Exhibit 170].

- 270. On September 7, 2022, Defendant published or caused to be published Copyrighted Photographs 79 to the following URLs:
  - https://www.dirt.com/gallery/moguls/fashion/kim-kardashian-house-calabasas-1203580392/
  - <a href="https://www.instagram.com/p/CiOZDS6uVdx/">https://www.instagram.com/p/CiOZDS6uVdx/</a>
  - https://www.facebook.com/dirt/posts/1109128526393251
  - https://robbreport.com/shelter/celebrity-homes/kim-kardashian-calabasas-condo-1234746733/
  - <a href="https://www.yahoo.com/entertainment/kim-kardashian-puts-her-minimalist-221500291.html">https://www.yahoo.com/entertainment/kim-kardashian-puts-her-minimalist-221500291.html</a>
  - <a href="https://www.aol.com/kim-kardashian-puts-her-minimalist-221500796.html">https://www.aol.com/kim-kardashian-puts-her-minimalist-221500796.html</a>
  - https://www.realtor.com/news/celebrity-real-estate/kim-kardashian-relists-calabasascondo-for-3-5m/

#### [Exhibit 171].

271. On September 22, 2022, Defendant published or caused to be published Copyrighted Photographs 80 to the following URLs:

- <a href="https://www.dirt.com/gallery/entertainers/actors/meagan-good-house-hollywood-hills-1203583828/meagangoodhouse\_hh16/">https://www.dirt.com/gallery/entertainers/actors/meagan-good-house-hollywood-hills-1203583828/meagangoodhouse\_hh16/</a>
- <a href="https://flipboard.com/article/harlem-star-meagan-good-buys-midcentury-hollywood-hills-home/f-3810155647%2Fdirt.com">https://flipboard.com/article/harlem-star-meagan-good-buys-midcentury-hollywood-hills-home/f-3810155647%2Fdirt.com</a>
- <a href="https://www.pinterest.com/pin/99008891799979220/">https://www.pinterest.com/pin/99008891799979220/</a>

# [Exhibit 172].

- 272. On July 6, 2022, Defendant published or caused to be published Copyrighted Photographs 81 to the following URLs:
  - https://robbreport.com/shelter/celebrity-homes/botched-host-bel-air-mansion-1234696300/
  - <a href="https://www.yahoo.com/now/co-host-botched-just-listed-110000586.html">https://www.yahoo.com/now/co-host-botched-just-listed-110000586.html</a>
  - https://flipboard.com/article/the-co-host-of-botched-just-listed-his-luxe-bel-air-mansion-for-30-million/f-f7d9e2bfbc%2Frobbreport.com
  - it <a href="https://www.scoop.it/topic/commercial-real-estate-by-enzo-calamo/p/4133804196/2022/07/06/the-co-host-of-botched-just-listed-his-bel-air-manse-for-30-million">https://www.scoop.it/topic/commercial-real-estate-by-enzo-calamo/p/4133804196/2022/07/06/the-co-host-of-botched-just-listed-his-bel-air-manse-for-30-million</a>
  - <a href="https://www.realtor.com/news/celebrity-real-estate/botched-star-paul-nassif-lists-bel-air-home/">https://www.realtor.com/news/celebrity-real-estate/botched-star-paul-nassif-lists-bel-air-home/</a>

# [Exhibit 173].

- 273. On April 3, 2023, Defendant published or caused to be published Copyrighted Photographs 82 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/paul-r-williams-cottage-house-for-sale-windsor-square-1203627922/

#### [Exhibit 174].

- 274. On June 9, 2022, Defendant published or caused to be published Copyrighted Photographs 83 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/emmy-raver-lampman-house-sherman-oaks-1203564899/">https://www.dirt.com/gallery/entertainers/actors/emmy-raver-lampman-house-sherman-oaks-1203564899/</a>
  - <a href="https://www.instagram.com/p/CepSpBOtgqR/">https://www.instagram.com/p/CepSpBOtgqR/</a>
  - https://www.facebook.com/page/390531891586255/search/?q=emmy%20raver
  - https://www.pinterest.com/pin/104286547616222109/

#### [Exhibit 175].

- 275. On June 2, 2022, Defendant published or caused to be published Copyrighted Photographs 84 to the following URLs:
  - https://www.dirt.com/gallery/more-dirt/real-estate-listings/bunker-hill-house-silver-lake-los-angeles-1203563595/bunkerhillhouse\_ah15/

#### [Exhibit 176].

- 276. On April 1, 2022, and August 17, 2022, Defendant published or caused to be published Copyrighted Photographs 85 to the following URLs:
  - <a href="https://www.dirt.com/gallery/more-dirt/real-estate-listings/instagram-worthy-house-los-feliz-1203477556/instagramhouse\_lf1-2/">https://www.dirt.com/gallery/more-dirt/real-estate-listings/instagram-worthy-house-los-feliz-1203477556/instagramhouse\_lf1-2/</a>
  - 2 https://www.dirt.com/gallery/moguls/fashion/kristin-ess-house-los-angeles-1203576724/instagramhouse\_lf14/
  - https://www.pinterest.com/pin/277675133266670568/
  - https://www.pinterest.com/pin/232498399505129635/

https://www.pinterest.co.uk/pin/swoonworthy-english-tudor-is-yours-for-the-taking-in-los-feliz--232498399505129635/

#### [Exhibit 177].

- 277. On January 30, 2023, Defendant published or caused to be published Copyrighted Photographs 86 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/simon-helberg-house-los-angeles-los-feliz-butterfly-sanctuary-1203615879/simonhelberg\_lfred1/">https://www.dirt.com/gallery/entertainers/actors/simon-helberg-house-los-angeles-los-feliz-butterfly-sanctuary-1203615879/simonhelberg\_lfred1/</a>

# [Exhibit 178].

- 278. On May 2, 2022, Defendant published or caused to be published Copyrighted Photographs 87 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/simon-helberg-house-lof-feliz-1203557368/simonhelberghouse\_lf/
  - <a href="https://www.instagram.com/p/CdHNnQdPZ9w/">https://www.instagram.com/p/CdHNnQdPZ9w/</a>
  - https://www.facebook.com/dirt/posts/1027716344534470

#### [Exhibit 179].

- 279. On March 30, 2022, Defendant published or caused to be published Copyrighted Photographs 88 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/musicians/bob-weir-house-studio-city-los-angeles-1203467166/bobweirhouse\_sl/">https://www.dirt.com/gallery/entertainers/musicians/bob-weir-house-studio-city-los-angeles-1203467166/bobweirhouse\_sl/</a>
  - https://www.instagram.com/p/CbyTezEu38c/
  - https://www.facebook.com/page/390531891586255/search/?q=bob%20weir
  - https://www.pinterest.com/pin/bob-weir-bought-a-los-angeles-house-dirt-in-2022- 339951471884657929/

- https://www.pinterest.com/pin/bob-weir-bought-a-los-angeles-house-dirt-in-2022-339951471884657920/
- <a href="https://flipboard.com/article/the-grateful-dead-s-bob-weir-rocks-into-cozy-silver-lake-bungalow/f-ee4cb3f11a%2Fdirt.com">https://flipboard.com/article/the-grateful-dead-s-bob-weir-rocks-into-cozy-silver-lake-bungalow/f-ee4cb3f11a%2Fdirt.com</a>

# [Exhibit 180].

- 280. On June 5, 2022, Defendant published or caused to be published Copyrighted Photographs 89 to the following URLs:
  - <a href="https://www.dirt.com/gallery/entertainers/actors/tatiana-maslany-house-shadow-hills-1203564014/tatianamaslany-house\_sh1/">https://www.dirt.com/gallery/entertainers/actors/tatiana-maslany-house-shadow-hills-1203564014/tatianamaslany-house\_sh1/</a>
  - https://www.pinterest.com/pin/tatiana-maslany-bought-a-stylish-los-angeles-house-dirt-in-2022--232498399505381413

# [Exhibit 181].

- 281. On September 28, 2022, Defendant published or caused to be published Copyrighted Photographs 90 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/laura-harrier-house-hollywood-hills-1203584784/
  - <a href="https://realproperty.news/mike-star-laura-harrier-bought-a-renovated-home-in-los-angeles-dirt-50412.html">https://realproperty.news/mike-star-laura-harrier-bought-a-renovated-home-in-los-angeles-dirt-50412.html</a>

#### [Exhibit 182].

- 282. On February 4, 2022, Defendant published or caused to be published Copyrighted Photographs 91 to the following URLs:
  - https://www.dirt.com/gallery/entertainers/actors/kj-apa-house-hollywood-hills-1203451774/

- https://www.instagram.com/p/CZpROY1v1t3/
- https://www.facebook.com/dirt/posts/976457582993680

# [Exhibit 183].

- 283. On April 16, 2023, Defendant published or caused to be published Copyrighted Photographs 92 to the following URLs:
  - www.dirt.com/gallery/entertainers/musicians/halsey-house-calabasas-for-sale-1203630914/screen-shot-2023-04-16-at-1-52-08-am/

## [Exhibit 184].

- 284. Defendant is not and has never been licensed to use or display Copyrighted Photographs. Defendant never contacted Plaintiff to seek permission to use Copyrighted Photographs in connection with its websites or for any other purpose.
- 285. Upon information and belief, Defendant located copies of Copyrighted Photographs on the internet and, rather than contact Plaintiff to secure licenses, simply copied Copyrighted Photographs for its own commercial use and financial benefit.
- 286. Plaintiff first discovered Defendant's unauthorized use and display of Copyrighted Photographs on or about October 1, 2022. Following Plaintiff's discovery, Plaintiff notified Defendant in writing of such unauthorized use. To date, Plaintiff has been unable to negotiate reasonable compensation for the infringements of Copyrighted Photographs.
- Defendant intentionally added incorrect "credit" to its infringements of Plaintiff's Copyrighted Photographs, including "MLS," "Realtor.com," "Associated Press," "Compass," "Redfin," "HBO," "Zillow," "Noel Kleinman," "Normand & Associates," "Anthony Barcelo," "VistaSir.com," "The Agency," "Scott Olson," "Todd Goodman/LA Light Photography," "Equity Union," and "Hilton & Hyland" [Exhibits 93-184].

- 288. Defendant attached incorrect "credit" to its infringing use of Plaintiff's Copyrighted Photographs to intentionally conceal the fact Defendant copied, posted, and disseminated Copyrighted Photographs without securing proper license or permission from Plaintiff.
- 289. In the few cases where Defendant attached proper "credit" ("Alex Zarour," "Virtually Here Studios," or "Alex Zarour/Virtually Here Studios") to its infringing use of Plaintiff's Copyrighted Photographs, it did so intentionally and with direct knowledge it had not secured proper license or permission from Plaintiff.
- 290. Defendant is an experienced actor concerning the display of visual material online, including photographs.
- 291. Prior to the allegations contained in this lawsuit, Defendant possessed first-hand knowledge it must secure proper license or permission <u>from the copyright holder</u> of photographs before copying, posting, or disseminating such photographs online or in any other medium.

#### **COUNT I: COPYRIGHT INFRINGEMENT**

- 292. Plaintiff incorporates herein by this reference each and every allegation contained in each paragraph above.
- 293. Copyrighted Photographs are original works of authorship, embodying copyrightable subject matter, and therefore subject to the full protection of the United States copyright laws (17 U.S.C. § 101 et seq.).
- 294. Alex Zarour owns valid copyrights in Copyrighted Photographs, having registered Copyrighted Photographs with the Register of Copyrights.
- 295. Plaintiff has standing to bring this lawsuit and assert the claim(s) herein as it has sufficient rights, title, and interest to such copyright.

- 296. Defendant reproduced, distributed, and publicly displayed Copyrighted Photographs without authorization from Plaintiff.
- 297. By its actions, Defendant infringed and violated Plaintiff's exclusive rights in violation of the Copyright Act, 17 U.S.C. § 501, by reproducing, distributing, and publicly displaying Copyrighted Photographs for its own commercial purposes.
- 298. Defendant's infringement was willful as it acted with actual knowledge or reckless disregard for whether its conduct infringed upon Plaintiff's copyright.
- 299. Plaintiff has been damaged as a direct and proximate result of Defendant's infringement.
- 300. Plaintiff is entitled to recover its actual damages resulting from Defendant's unauthorized use of Copyrighted Photographs and, at Plaintiff's election (pursuant to 17 U.S.C. § 504(b)), Plaintiff is entitled to recover damages based on a disgorgement of Defendant's profits from infringement of Copyrighted Photographs, which amounts shall be proven at trial.
- Alternatively, to the extent infringement by Defendant of Copyrighted Photographs occurred post-registration or within the three (3) month period between first publication and registration, and at Plaintiff's election, Plaintiff is entitled to statutory damages pursuant to 17 U.S.C. § 504(c), in such amount as deemed proper by the Court.
- 302. To the extent infringement by Defendant of Copyrighted Photographs occurred post-registration or within the three (3) month period between first publication and registration, Plaintiff is further entitled to recover its costs and attorneys' fees as a result of Defendant's conduct pursuant to 17 U.S.C. § 505 for such infringement of the corresponding Copyrighted Photographs.

# COUNT II: REMOVAL AND ALTERATION OF INTEGRITY OF COPYRIGHT MANAGEMENT INFORMATION PURSUANT TO 17 U.S.C. § 1202

- Plaintiff is informed and believes Defendant, without the permission or consent of Plaintiff, knowingly and with the intent to conceal infringement, provided false copyright information management information before displaying Copyrighted Photographs on Defendant's websites, <a href="www.dirt.com">www.dirt.com</a>, and <a href="www.dirt.com">www.robbreport.com</a>, and corresponding third party versions of such articles which included Copyrighted Photographs. In doing so, Defendants violated 17 U.S.C. § 1202(a)(1) and (b)(1).
- 304. As a result of Defendant's actions, Plaintiff is entitled to actual or statutory damages pursuant to 17 U.S.C. § 1203(c), in such amount as deemed proper by the Court.

  Plaintiff is further entitled to their attorneys' fees and costs pursuant to 17 U.S.C. § 1203(b)(5).

  WHEREFORE, Plaintiff demands judgment against Defendant as follows:
- a. A declaration that Defendant has infringed Plaintiff's copyrights in Copyrighted Photographs;
- b. A declaration that such infringement is willful (to the extent applicable);
- c. An award of actual damages and disgorgement of profits as the Court deems proper or, at Plaintiff's election (to the extent applicable), an award of statutory damages for willful infringement up to \$150,000.00 for infringement of each photograph comprising the Work.
- d. Awarding Plaintiff its costs and (if applicable) reasonable attorneys' fees pursuant to 17
   U.S.C. § 505;
- e. Awarding Plaintiff interest, including prejudgment interest, on the foregoing amounts;
- f. Permanently enjoining Defendant, its employees, agents, officers, directors, attorneys, successors, affiliates, subsidiaries, and assigns, and all those in active concert and participation with Defendant, from directly or indirectly infringing Plaintiff's copyrights or

continuing to display, transfer, advertise, reproduce, or otherwise market Copyrighted Photographs or to participate or assist in any such activity; and

g. For such other relief as the Court deems just and proper.

# **JURY DEMAND**

Plaintiff hereby demands a trial by jury on all claims for which there is a right to jury trial.

Dated: March 28, 2024 The Law Office of David C. Deal, P.L.C.

/s/ David C. Deal
David C. Deal
117 4<sup>th</sup> Street NE
Charlottesville, VA 22902
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Counsel for Plaintiff